



Human Rights Ombudsman
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**Council of Europe
Group of Experts on Action against Violence against Women and
Domestic Violence (GREVIO)**

**Written contribution to the First Thematic Evaluation Round
on the implementation of the Council of Europe Convention on
Preventing and Combating Violence against Women and Domestic
Violence (Istanbul Convention)**

November 2025

The Human Rights Ombudsman of the Republic of Slovenia (hereafter: the Ombudsman) welcomes the opportunity to provide input to GREVIO's first thematic evaluation round on the implementation of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention), focusing on building trust by delivering support, protection and justice.

The Ombudsman is a constitutional body mandated to protect and promote human rights in Slovenia, with status A awarded in accordance with the Principles relating to the Status of National Institutions. Its mandate includes monitoring, research, addressing opinions and recommendations to authorities, human rights education,¹ awareness-raising, and investigating complaints received by anyone who believes that their human rights or fundamental freedoms have been violated **by state authority, local community authority, or a holder of public authority.**² The Ombudsman may initiate a procedure to review the constitutionality or legality of regulations and may file a constitutional complaint with the Constitutional Court on an individual case before him. The Ombudsman also acts as the national preventive mechanism under the Optional Protocol to the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment.

The Ombudsman hereby shares observations and insights from its work concerning violence against women and domestic violence.

¹ Together with the Scientific Research Center Koper and primary schools in Ljubljana, the Ombudsman participates in the project REBOOT NOW - Prevention of gender-based violence in schools, which is financed by the European Commission within the framework of the Program for Citizens, Equality, Rights and Values. The Ombudsman also cooperates with the Center for Social Informatics of the Faculty of Social Sciences of the University of Ljubljana in the international project TRACeD, the purpose of which is to address gender-based online violence against girls and young women.

² [When to turn to The Human Rights Ombudsman?](https://www.varuh-rs.si/fileadmin/user_upload/pdf/zlozenke_nase/zlozenka_praviceANG_web.pdf), https://www.varuh-rs.si/fileadmin/user_upload/pdf/zlozenke_nase/zlozenka_praviceANG_web.pdf

I. Developments since the last GREVIO evaluation (2020)

1. Since the last GREVIO evaluation visit in 2020, the Ombudsman welcomes the significant progress achieved in the implementation of several of its previous recommendations. The Ombudsman commends the legislative and policy developments that have brought Slovenia closer to full compliance with the standards of the Istanbul Convention. In particular, the Ombudsman welcomes the amendment of Articles 170 and 171 of the Criminal Code (KZ-1), ensuring that the criminal offences of rape and sexual violence are now based on the absence of freely given consent, in line with Article 36 of the Istanbul Convention. The Ombudsman also acknowledges the removal of the requirement for prosecution upon the victim's request in cases where the perpetrator is a partner or spouse, as well as the amendment of the Crime Victims Compensation Act (ZOZKD), which abolished the citizenship condition for state compensation for victims of intentional violent crimes. Finally, the Ombudsman welcomes the adoption of the Resolution on the National Programme for the Prevention of Domestic Violence and Violence against Women 2024–2029.

II. Prevalence and nature of gender-based violence

2. Gender-based violence remains a serious problem in Slovenia. Data indicate that a significant proportion of women have experienced physical, sexual, or psychological violence. The Ombudsman stresses the need for reliable data to develop effective policies and draws attention to violence affecting vulnerable groups, including children, the elderly, persons with disabilities, migrants, and members of the Roma community. Efforts to prevent gender-based violence must be strengthened.
3. According to a survey conducted by SURS (using data from 2020), 22% of women and 16% of men have experienced physical or sexual violence since the age of 15. Domestic violence was experienced at least once since the age of 15 by 14.9% of women and 5.4% of men aged 18–74. Three quarters of domestic violence incidents involved physical violence with threats, while one quarter involved sexual violence. Women were three times more frequently victims of domestic violence and five times more frequently victims of domestic sexual violence than men.

Almost one third (28%) of women and one fifth (20%) of men who have ever had a partner were victims of at least one type of intimate partner violence (threats, psychological, physical, sexual or economic). The most common type of intimate partner violence is psychological violence: 26.2% of ever-partnered women and 19.7% of ever-partnered men have experienced such violence. Sexual violence is the least common form of intimate partner violence; however, women are 5.6 times more frequently victims of such violence than men. Just over 60% of victims talk about their experience of violence, most commonly with someone close to them. However, most violence remains unreported, as victims seldom report it to the police or other institutions. According to the SURS survey, only 21.8% of victims of intimate partner violence reported it to the police, and 21.1% spoke about it with health or social services.³

According to SURS, almost a third of ever-working women (31.7%) experienced sexual harassment at work. Women aged 18–29 years are the most vulnerable regarding

³ More information available at: <https://www.stat.si/StatWeb/en/News/Index/10159>
www.varuh-rs.si

exposure to sexual harassment at work and stalking. The former has been experienced by one in two women and the latter by one in four.⁴

4. A survey done in 2022 by Gender Equality Research Institute - IPES on gender equality in rural areas⁵ showed widespread violence in rural areas; 43% of all respondents noticed at least one type of violence in their surroundings in the six months before the survey, twice as high against women than men. In addition, the analysis showed a high tolerance for psychological violence. 35% of male and 38% of female respondents believe that shouting, insults and threats are not considered violence. The research also showed a lack of knowledge of organisations that provide help to victims of violence in times of need and a strong agreement that resources of help available to victims of violence in rural areas are insufficient. 67% of all respondents (and 75% of all women respondents) believed there are not enough such resources available in rural areas.

Early and forced marriages: identification and prevention

5. The Ombudsman notes the problem of child “marriages” in the Roma population, which may result in forced marriages and even trafficking in human beings. However, there is a lack of official data, knowledge and awareness regarding these issues among schools, social work centres, prosecution offices and courts.

In 2021, the Human Rights Ombudsman of the Republic of Slovenia gathered information from all 58 administrative units and all centres for social work regarding the occurrence of forced marriages. None of the institutions reported official cases of forced marriage. However, several centres and administrative units noted the presence of early marriages⁶, extramarital unions involving minors, the escape of minors into harmful environments, and pregnancies of underage girls, especially within Roma communities. These patterns may point to underlying harmful practices that remain hidden and unreported.

Administrative units reported no uniform approach to addressing suspected forced marriages. Most would act on suspicion by consulting with the Ministry of the Interior, the Ministry of Labour, Family, Social Affairs and Equal Opportunities, police, or prosecution authorities. However, many highlighted the difficulty in identifying coercion, especially due to the limited interaction time between officials and the couples, and the absence of clear protocols for dealing with suspected cases. Some administrative units called for official guidelines or protocols, noting that relying on discretionary decisions and general procedural laws was insufficient. Others considered current procedures adequate but acknowledged the lack of capacity to detect signs of coercion, particularly where early marriages involve minors. Several units also raised concerns about conflation of forced and sham marriages, as legal definitions may not clearly differentiate between the two.

⁴ <https://www.stat.si/StatWeb/en/News/Index/10283>

⁵ The research was carried out as part of the TERA project (Development of a Comprehensive Approach for Enhancing Work-Life Balance of Professional and Private Life in Rural Areas, Based on the Establishment of Multi-Stakeholder Regional Systems and Local Partnerships), financed by EEA Norway Grants 2014-2021 and Government Office for Development and European Cohesion Policy. 707 persons who live in the countryside participated in the research by answering an anonymous survey.

⁶ Social work centres – as well as members of the Roma community themselves – often interpret “early marriages” as including cases of informal unions between minors. Such situations are commonly perceived as early marriages within the community, although they are **informal and not legally recognised** as marriages.

The Ombudsman also examined the responses of centres for social work, which similarly reported no formal cases of forced marriage involving minors in 2021. However, many centres described early marriages and escapes of minors into harmful environments as ongoing issues, particularly within Roma communities. The Ombudsman expressed concern that these practices are under-identified and insufficiently addressed, citing a lack of proactive fieldwork and systemic tools for early detection. Furthermore, the Ombudsman noted a lack of disaggregated data, especially regarding cases involving minors from vulnerable groups such as Roma or foreign nationals. Centres also identified numerous systemic challenges, including staffing shortages, lack of cultural mediators or language skills, and poor interinstitutional coordination. The Ombudsman recommended enhancing the capacities of social workers and ensuring specialised training, increased staffing, and stronger cooperation with NGOs. In response to the Ombudsman's recommendations, the Ministry of Labour reported some staffing increases in 2022, including positions specifically dedicated to fieldwork with Roma communities. However, the Ombudsman found these efforts insufficient in light of the growing complexity and scale of the issues. The Ombudsman has also recommended the urgent establishment of unified protocols, regular and specialised training for registry officers and social workers, and increased presence of professionals in Roma settlements, to better identify and address potentially exploitative practices, including forced and early marriages.

Data collection and research (Article 11)

6. The Human Rights Ombudsman has repeatedly pointed out that Slovenia lacks national, representative surveys on all forms of violence against women, which would reveal the full picture of violence, not only cases reported to law enforcement authorities. The Ombudsman considers that greater attention should be devoted to effective research and documentation of the scope, causes, consequences, and indicators of violence, and to obtaining reliable and comparable data that would inform effective prevention policies, address the consequences of violence, and allow for the evaluation of measures. In the context of violence against women and domestic violence, it is necessary to examine the extent of violence against children and the elderly, while also giving due attention to persons with disabilities, those with a migrant background, individuals living in Roma communities, and other particularly vulnerable groups. From the information submitted by Slovenia to CEDAW⁷ it follows that, since March 2023 when the Committee issued its recommendations to ensure systematic data collection and analysis, no new national survey on the prevalence of violence has been carried out, and no integrated database has been established.
7. The Human Rights Ombudsman of the Republic of Slovenia welcomes the adoption of the Resolution on the National Programme for the Prevention of Domestic Violence and Violence against Women 2024–2029, which sets out as one of its strategic goals the provision of quality data on domestic violence and violence against women. In this Resolution, authorities acknowledge that there are no quality data on domestic violence and violence in residential communities against persons with disabilities or against lesbian, gay, bisexual, trans and non-binary persons, and that further research is needed on early and forced marriages of minors. It also recognizes that existing data collections are unsynchronized and often methodologically weak, being filled in inconsistently or

⁷ See: Committee on the Elimination of Discrimination against Women, *Information received from Slovenia on follow-up to the concluding observations on its seventh periodic report*, 5 March 2025, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW%2FC%2FSVN%2FFCO%2F7&Lang=en
www.varuh-rs.si

lacking essential indicators such as the sex of the victim and perpetrator and the relationship between them. The Resolution therefore foresees upgrading social databases, standardizing data entry, improving the recording of cases, harmonizing criteria for statistics across sectors, creating an interoperable database, conducting representative surveys, and researching public attitudes, sexism and early and forced marriages. It also envisages strengthening data collection on sexual harassment and sexual crime. However, in the Action Plan for 2024–2025, the only measure specifically listed is the reinforcement of data collection on sexual harassment and sexual crime by the State Prosecutor's Office.

IV. Prevention, protection and support

8. The Ombudsman reiterates its standing recommendation from 2020, calling on the competent authorities in the fields of social affairs, education, health care, justice, and policing to enhance the dissemination of information to older persons, recognised as a particularly vulnerable group, regarding the possibilities for reporting domestic violence, available protection measures, and sources of assistance. Although this recommendation was accepted in the government's 2021 follow-up report, the Ombudsman notes that implementation remains inconsistent and largely dependent on the initiative of individual local stakeholders, as no nationwide awareness campaign has been observed.
9. In 2024, the Ombudsman published a brochure titled *Older People Have Rights Too*, which provides an overview of the rights of older persons, with particular emphasis on the rights of those living in residential care homes. The publication raises awareness of several pressing issues, including ageism and violence against older persons, and explains how to recognise these issues and what steps to take in such situations. It also provides guidance on how the Ombudsman can assist older individuals and outlines which institutions they can turn to if they find themselves in distress or facing difficulties. Alongside the brochure, the Ombudsman prepared posters summarising the key messages. Both the brochures and posters were distributed to all retirement homes and health centres across the country, with the aim of reaching as many older people as possible — as well as the general public.
10. In recent years, the Ombudsman has highlighted violence against older persons as an increasingly urgent and serious issue. The institution has observed a growing number of complaints alleging violence and inhumane or degrading treatment in social care institutions, including anonymous submissions—possibly indicating fear of retaliation among residents. Additionally, the Ombudsman has noted cases of violence committed by family members against older persons, which older individuals often do not recognise as abuse or are afraid to report due to their dependence on the perpetrators.

Based on the complaints received and visits to social care institutions, the Ombudsman has recommended the development of appropriate protocols for all relevant stakeholders and called for more preventive programmes at the national level to help identify violence and other irregularities. It is particularly concerning that victims—especially older persons—often do not even recognise that they are living in abusive situations. Therefore, preventive efforts must focus not only on detection and intervention but also on awareness-raising to enable victims to identify violence and seek help.

The Ombudsman emphasises the need to establish an effective state-level mechanism with a clear timeline, defined outcomes, and robust, transparent oversight supported by concrete financial resources.

Education (Article 14)

11. The Ombudsman has also highlighted the growing problem of online violence among young people. Online violence is becoming increasingly extreme, while there is a worrying trend of its normalisation and a lack of adequate response from adults. The Ombudsman has emphasised the importance of early awareness-raising and education for children, adolescents, parents and teachers on the safe and responsible use of the internet. Particular emphasis was placed on the need for greater media literacy among children and parents, to enable them to critically assess online information and use technology safely and responsibly.
12. In a joint statement issued in September 2023, the Ombudsman and eleven organisations active in the field of children's rights called for comprehensive education and training for both teachers and children on all forms of violence—physical, psychological, sexual, economic, as well as online violence and neglect—in an age-appropriate manner, to enable children to recognise abuse and seek help. Children must be empowered to ask for help when they are victims or witnesses of violence. A crucial message that pupils and students should receive in school is that all forms of violent behaviour—whether at school, at home (within the family), online, or elsewhere—are unacceptable. Children need support to speak up about the violence they experience or witness, as well as clear guidance on how and to whom they can report it (teachers, school counsellors, or other responsible adults). In this context, there is a noticeable absence of a national intervention algorithm for addressing peer violence in schools—one that is clear and comprehensive, with precisely defined steps to be taken within the school, including the involvement of other services, from reporting the violence to addressing both the victims and perpetrators, ensuring victim protection, and preventing confrontation between the victim and the perpetrator. There is also a lack of accessible information on available support services.
13. In the joint statement, the organisations proposed introducing a mandatory multidisciplinary school subject aimed at equipping students with life competencies, including awareness and prevention of violence within and outside the school environment (especially online violence, given the strong correlation between physical and online bullying shown in research studies), mental health promotion, and the development of healthy relationships. The proposal also included topics such as human rights and fundamental freedoms, non-discrimination, stereotypes, sex education, social skills, media literacy, relationships (healthy and unhealthy relationships, partner violence and communication) and the safe use of the internet.

Training of professionals (Article 15)

14. The Ombudsman repeatedly underscores the urgent need for systematic training of professionals working in the judiciary, law enforcement and social services. A lack of awareness and sensitivity among staff was identified as a significant obstacle to effective intervention and victim protection.

Protection and support

15. In 2024, while handling a complaint, the Ombudsman found shortcomings in the provision of protection and stressed that when a victim finds the courage to speak out, it is crucial to approach her situation with particular care and sensitivity. Negligent or indifferent handling may have long-term negative consequences and undermine the victim's trust in the State's ability to provide protection. This was clearly demonstrated in a concrete case concerning a resident of a Roma settlement, who was illiterate and spoke or understood Slovenian only poorly. She informed the Ombudsman that she had been extorted by several individuals who demanded her bank card and money. She had already submitted multiple reports to the police, yet no action was taken, despite Article 13 of the Police Tasks and Powers Act (ZNPPol), which explicitly requires the police to act with particular consideration toward victims and persons in need of additional care and assistance, such as children, minors, the elderly, persons with disabilities, pregnant women and victims of domestic violence. Illiterate Roma women, who often do not speak Slovenian well and cannot clearly describe or explain the actual circumstances of a criminal offence or misdemeanour, undoubtedly also fall into this category. According to the Ombudsman, in this case, the shortcomings in police response were not due to intentional inaction, but rather a failure to give sufficient attention to the personal circumstances of the complainant. It is commendable that the police eventually followed the Ombudsman's recommendation to conduct an interview with the complainant and allowed her to submit an oral criminal complaint.
16. The Ombudsman has persistently and, over many years, raised concerns over the general shortage of experts in clinical psychology of children and adolescents, psychiatry and child psychiatry in Slovenia, which has caused long waiting times for psychological and psychiatric treatment of children. Despite numerous warnings, the shortage of child psychiatrists and clinical psychologists remains acute. Long waiting times continue to prevent access to timely and appropriate help, including for children and adolescents who have experienced trauma or violence in the family environment. Children who are victims or witnesses of domestic violence often require specialised psychological support, which is neither systematically provided nor equally accessible across the country.
17. The Ombudsman supported and welcomed the establishment of Barnahus (Children's House) in Slovenia, recognising it as an essential, child-friendly, multidisciplinary and inter-institutional model for the treatment of child victims of sexual abuse and for providing services to children who are victims or witnesses of violent crimes. The Act on the Protection of Children in Criminal Proceedings and Their Comprehensive Treatment in the Barnahus (Children's House) entered into force on 24 April 2021. According to information received from the Children's House, the number of court orders increased from two in 2022 to 35 in 2023 and 57 in 2024, while the number of children receiving comprehensive treatment increased from two in 2022 to 54 in 2023 and 79 in 2024.
18. The Ombudsman would also like to point out that there is **no special crisis referral centre in Slovenia for victims of rape or sexual violence** which would perform a medical and forensic investigation and provide trauma assistance and counselling to the victims (in line with Article 25 of the Istanbul Convention).

VI. Reservations to the Convention (Article 78)

19. The Human Rights Ombudsman of the Republic of Slovenia has consistently recommended that, where the reasons for Slovenia's reservations to the Istanbul Convention no longer exist, these reservations should be formally withdrawn.

In September 2025, the Ombudsman addressed a letter to the Ministry of Justice, the Ministry of the Interior, and the Ministry of Labour, Family, Social Affairs and Equal Opportunities, with copies to the Prime Minister's Office, the President of the Republic, and the Ministry of Foreign and European Affairs. The letter sought clarification on the legislative grounds for maintaining the existing reservations and requested information on the steps planned towards full alignment with the Convention.

In its response dated 9 October 2025, the Ministry of Justice provided a detailed overview of the status of each reservation:

- **Article 30(2):** The reservation may be withdrawn, as recent amendments to the Crime Victims Compensation Act have eliminated the requirement of Slovenian or EU citizenship for victims of intentional violent crimes to access compensation.
- **Article 44(1)(e):** The reservation remains, as the concept of "habitual residence" lacks sufficient legal definition in Slovenian law. Its inclusion could cause legal uncertainty and would potentially conflict with the principle of legality in criminal law.
- **Article 44(3):** This reservation may also be withdrawn, since the Criminal Code (KZ-1) already provides jurisdictional competence through Articles 12 and 13, in conjunction with Articles 14(4), 14(5), and 14(7).
- **Articles 44(4) and 55(1):** The withdrawal of these reservations is envisaged following the adoption of a draft amendment to the Criminal Code, which was submitted to the National Assembly in February 2025. The amendment includes the proposed deletion of paragraph six of Articles 170 and 171, deemed necessary for alignment with the Convention. Its adoption remains pending, currently linked to the outcome of parliamentary deliberations on the proposed Act on Assistance in Voluntary Termination of Life (ZPPKŽ).
- **Article 58:** The reservation is no longer required, as the third paragraph of Article 90 of the Criminal Code now stipulates that the limitation period for prosecution begins when the victim reaches the age of majority.
- **Article 59:** The relevant legal obstacle to withdrawal has been removed through amendments to the Aliens Act, rendering this reservation unnecessary.

The Ministry of Justice further indicated that, upon adoption and publication of the Criminal Code amendment in the Official Gazette, the Ministry of Labour, Family, Social Affairs and Equal Opportunities will initiate the procedure for amending the Act of Ratification, thereby enabling the formal withdrawal of the relevant reservations.

VII. Trafficking in Human Beings: Access to Protection, Support and Compensation

Although trafficking in human beings is addressed under a separate international framework, the Ombudsman notes that several issues it has examined in this area intersect with the scope of the Istanbul Convention.

Access to compensation

20. The Ombudsman welcomes the fact that its recommendation to remove the citizenship requirement from the Crime Victims Compensation Act has been implemented. However, in the Ombudsman's view, this does not eliminate all obstacles to accessing compensation for victims of trafficking in human beings. According to the Ombudsman's latest information, collected during the most recent GRETA evaluation visit, no claims for compensation were filed by victims of trafficking in human beings in the period 2017–2023. This suggests that removing the citizenship requirement alone is insufficient to ensure that victims have proper access to compensation. Proactive information must be provided to victims and their legal representatives about their right to seek compensation. The Ombudsman also recommends the establishment of an asset recovery office and a special compensation fund for victims.

Access to health care for victims

21. In 2025, the Ombudsman continued to address the issue of access to health care for victims of trafficking in human beings, as despite repeated warnings the matter remained unsystematically regulated. The Ombudsman had already warned in its Annual Reports for 2020 (pp. 243–246) and 2021 (p. 225) that victims often do not have health insurance, which may prevent them from accessing comprehensive, timely and continuous health care, especially psychological and psychiatric assistance, which is often crucial for recovery due to the nature of the trauma experienced.

In a letter addressed to the Ministry of Health, the Ombudsman once again emphasised that the current arrangement is based on a temporary solution – a decision by the Interdepartmental Working Group on Combating Trafficking in Human Beings, whereby the Ministry of Health issues a certificate for each identified victim enabling access to emergency and additional health care as determined by a physician. The Ombudsman stressed that such a solution does not allow for a systemic approach and is left to the discretion of the competent authorities on a case-by-case basis. The Ombudsman therefore once again called on the Ministry to clarify whether, in accordance with Ombudsman's recommendation from 2020, it had already prepared a proposal for legislative amendments to formally regulate the insurance status of victims of trafficking in human beings.

In its response, the Ministry stated that in practice, it proceeds in accordance with the Manual on Identification, Assistance and Protection of Victims of Trafficking in Human Beings, based on GRETA's report and related recommendations. Upon placement of a victim in an assistance programme, a multidisciplinary team is formed which, together with a representative of the Ministry, determines the necessary measures. If the victim needs medical treatment, it is provided immediately – either within the public health system or by private providers if urgent. The costs are fully covered by the Ministry of Health. The Ministry explained that integrating victims into the health insurance system is not appropriate, as these are often individuals who will not remain in Slovenia. In such

cases, the procedures would be longer (searching for a personal doctor, waiting times) and would even complicate access to treatment. The Ministry believes that an out-of-system approach is more suitable, being more accessible, cheaper, and faster. Therefore, legislative changes are not planned. The National Anti-Trafficking Coordinator assessed the Ministry's activities as effective and coordinated.

The Ombudsman understands that the practice described by the Ministry may enable some victims to access medical assistance quickly. However, it believes that such an approach – implemented outside the health insurance system and without a clear legal basis – does not ensure legal certainty and equal treatment for all victims. The definition of rights arising from health care should be clear, predictable and accessible without intermediate administrative decisions or ad hoc certificates. Victims of trafficking in human beings are among the most vulnerable population groups, often exposed to severe forms of violence and exploitation, which is why access to comprehensive, long-term psychological and other health care is a crucial condition for their recovery, reintegration and protection from re-exploitation.

The need for comprehensive psychosocial support to victims of trafficking in human beings was also highlighted by GRETA in its third report on Slovenia (paragraph 55, 2023), which recommended that the competent authorities provide long-term psychological support to enable recovery and reintegration.

The Ombudsman reiterates that temporary, out-of-system solutions based on discretionary decisions of individual authorities are not an appropriate way to implement fundamental rights. Such arrangements do not ensure legal certainty, equal treatment, and access to rights in a predictable and systematic manner. Particularly problematic is the fact that this approach is not sustainable and does not offer long-term protection for one of the most vulnerable groups of the population.

The Ombudsman therefore reiterates its recommendation that the Ministry of Health prepare the necessary legislative amendments to formally regulate the insurance status of victims of trafficking in human beings within the health care system.

Identification of victims among applicants for international protection

22. In 2025, the Ombudsman contacted the Ministry of the Interior (with which it maintains continuous communication on trafficking in human beings) for clarification on whether the Protocol on procedures for the identification of victims of trafficking in human beings among applicants for international protection, reportedly prepared in 2024 by the Legal Centre for the Protection of Human Rights and the Environment, had already been formally adopted. The Ombudsman also inquired about any recent activities related to the more effective identification of victims of trafficking in human beings. The Ombudsman specifically referred to the recommendations of GRETA, which in its most recent report called on Slovenian authorities to strengthen efforts to identify victims, with particular attention to victims among migrants and applicants for international protection, and to strive for more effective identification of child victims of trafficking in human beings.

In its reply, the Ministry of the Interior stated that in 2025, in order to improve the protection of minors among applicants for international protection, a coordination meeting was held with non-governmental and humanitarian organisations, where additional measures for identifying potential victims were discussed. According to the Ministry, two

key challenges were identified: the need to establish a unified communication channel between the Police and the Office for the Care and Integration of Migrants to facilitate effective information exchange, and the preparation of standard operating procedures for the identification of victims of trafficking in human beings among applicants for international protection, with an emphasis on unaccompanied children. Furthermore, in 2024, the Ministry of Labour, Family, Social Affairs and Equal Opportunities, in cooperation with NGOs and UNHCR, began drafting standardised procedures to improve the identification of child victims. The content of these procedures is expected to be included in the updated Manual on Identification, Assistance and Protection of Victims of Trafficking in Human Beings, being prepared as part of the Action Plan against Trafficking in Human Beings for 2025–2026. The Ministry explained that the Manual will also have to be aligned with the provisions of the new Pact on Migration and Asylum.

Regarding recommendations to expand the circle of entities authorised to formally identify victims, the Ministry of the Interior emphasised that this remains exclusively within the competence of the Police. Nevertheless, it acknowledged the important role of NGOs, social and health workers in early identification, awareness-raising, initial psychosocial support, and referral of victims for further formal identification procedures. The Ministry added that the safety of unaccompanied minors among asylum seekers who could be victims of trafficking is rarely endangered in Slovenia, as most of these persons voluntarily leave the country within a few days. They are provided with information about the dangers of trafficking in human beings and advised to seek help from the Red Cross or other relevant organisations in other EU countries in case of exploitation.

The Ombudsman assesses that the recent activities do not represent a significant step forward in improving institutional responsiveness – particularly due to the absence of the protocol or standardised procedures for improving victim identification, as well as the lack of a unified communication channel between the Police and the Office for the Care and Integration of Migrants for effective information exchange.

It remains problematic that, in the Republic of Slovenia, the formal identification of victims of trafficking in human beings continues to be the exclusive responsibility of the Police, which is not in line with international standards that favour a multidisciplinary approach (including NGOs, social and health workers). GRETA consistently emphasises that State Parties must establish a national referral mechanism based on the cooperation of different sectors. Directive 2011/36/EU likewise states that officials (in addition to the police, also public prosecutors, lawyers, members of the judiciary and court officials, labour inspectors, social, child and health care staff, consular staff and other groups of public officials) who may come into contact with potential victims should be trained and included in the identification process and work closely with civil society organisations. Similarly, the OSCE and UNODC stress the importance of establishing national mechanisms for the identification and protection of victims of trafficking in human beings that involve the cooperation of various stakeholders, such as law enforcement, NGOs, social and health workers, as a holistic, multidisciplinary approach is key to effective victim protection.

The Ombudsman specifically emphasises that merely informing unaccompanied minors about the dangers of trafficking and referring them to help abroad is not sufficient to meet the State's positive obligations; victims must be identified and protected in a timely manner, before exploitation occurs, especially when it comes to children. GRETA explicitly stresses the need to strengthen the proactive identification of minors who could

become victims of trafficking, regardless of whether they are already at risk within the territory of the country. Directive 2011/36/EU clearly states that victim protection should be available regardless of their willingness to cooperate in criminal proceedings, while the OSCE emphasises that protection should not depend on the victim's own initiative, but on the preventive and systemic duty of the State.

The Ombudsman recommended that the competent authorities ensure, without further delay, the adoption and implementation of a protocol or another equivalent standard document, such as standard operating procedures for the identification and treatment of victims of trafficking in human beings among applicants for international protection, with particular emphasis on vulnerable groups, especially unaccompanied minors. At the same time, it is essential to establish an effective, multi-stakeholder and inter-institutional mechanism that enables the active involvement of NGOs, health and social workers at all stages of early identification, formal identification and victim referral procedures, including the establishment of a unified communication channel between the Police and the Office for the Care and Integration of Migrants for effective information exchange. Such an approach must comply with international standards and aim to ensure comprehensive, timely and effective protection of the most vulnerable victims of trafficking in human beings – especially children, before they become victims.

Placement and protection of unaccompanied minors

23. In 2025, the Ombudsman also continued to monitor the issue of the placement of unaccompanied minors who are victims or potential victims of trafficking in human beings. This is one of the most vulnerable groups of children who require specially adapted protection, safe accommodation and appropriate psychosocial support, all in accordance with the principle of the best interests of the child.

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In 2022, the Ombudsman explicitly recommended that the competent ministries immediately coordinate and agree on a systemic arrangement in this area "in such a way that clear content and forms of assistance are defined that will ensure the implementation of the best interests of the child, comprehensive and long-term assistance and support to children with experience of trafficking in human beings, including the provision of special accommodation for children with experience of trafficking in human beings."

In 2025, the Ombudsman again contacted the Ministry of the Interior for more detailed information on measures and activities in this area. The Ministry stated that the care of minor victims of trafficking in human beings is still carried out within the framework of the existing programmes "Care of Victims of Trafficking in Human Beings – Crisis Accommodation" and "Care of Victims of Trafficking in Human Beings – Safe Space". However, it admitted that "the programmes impose an obligation on providers to provide assistance and protection to children victims of trafficking in human beings, but do not define clear content and forms of assistance that would ensure the implementation of the best interests of the child, especially from the point of view of appropriate placement." Crisis accommodation for victims of trafficking in human beings – both minors and adults – is provided under a contract between the Ministry and Slovenska Karitas. The capacities for crisis accommodation of children are limited and are usually activated mainly when simultaneous placement of a larger number of children is required. Further placement of children in safe spaces is carried out according to the established procedures to date.

In 2024, a professional meeting was held between representatives of the Ministry of the Interior and the Ministry of Labour, Family, Social Affairs and Equal Opportunities, where it was agreed that for particularly vulnerable unaccompanied minors with experience of trafficking in human beings, it is still necessary to establish systemic, separate and more appropriate accommodation. According to the Ministry, the competent departments continued discussions on possible systemic solutions during the same year, including the possibility of placing children in smaller, specialised residential groups for children with higher needs for security and professional support.

Until a special programme for the care of children in this area is established, the Protocol on Cooperation between Centres for Social Work and the Police in Assisting Unaccompanied Foreign Minors, which regulates the procedures for initial treatment, cooperation of centres for social work and the police, and the referral of children to appropriate accommodation facilities in cases of suspected trafficking in human beings, is still used.

The Ministry of Labour, Family, Social Affairs and Equal Opportunities additionally stated that it is aware of the importance of a systemic arrangement for the placement of unaccompanied children with experience of trafficking in human beings, particularly in light of the increasing number of war conflicts and humanitarian disasters that increase the vulnerability of children and adolescents. According to its own statements, the Ministry is striving to find specialised, separate capacities and is developing systemic solutions also in the context of the implementation 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, as well as other monitoring mechanisms.

The Ombudsman welcomes the efforts of the competent authorities so far but emphasises that a systemic solution that would be truly adapted to the specific needs of unaccompanied minors with experience of trafficking in human beings has not yet been established. It finds that the current arrangement is mainly based on temporary, project-based or out-of-system solutions that do not provide long-term legal certainty, stability and professional support, as required by the implementation of the principle of the best interests of the child.

Despite the existence of basic care, significant shortcomings persist, particularly the lack of legally binding, clear and standardised procedures, inadequately regulated issues of placement and weak inter-institutional coordination. Such a situation can seriously endanger the timely, comprehensive and adapted treatment of particularly vulnerable children and their adequate and lasting protection.

The Ombudsman therefore reiterates the urgency of establishing a legally binding and sustainable systemic arrangement that will systematically regulate all stages of the treatment of minor victims of trafficking in human beings – from early identification and appropriate and safe placement to the provision of further support. It is essential that the measures are based on a coordinated, comprehensive and professionally supported response of all competent authorities, with clearly defined responsibilities and cooperation mechanisms, and in compliance with the principle of the best interests of the child. The establishment of such a system is an important condition for ensuring professionally appropriate treatment and the fulfilment of the Republic of Slovenia's

international obligations in the field of human rights, child protection and the fight against trafficking in human beings.