



TF-THB REPORT

TRAFFICKING IN HUMAN BEINGS FOR THE PURPOSE OF SEXUAL EXPLOITATION IN THE BALTIC SEA REGION



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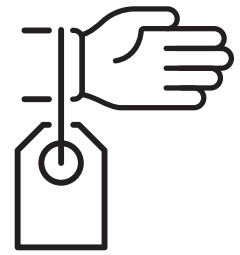
SUMMARY

This report provides an overview of the issue of trafficking in human beings (THB) for the purpose of sexual exploitation in the Baltic Sea Region and the member states of the Council of the Baltic Sea States (CBSS), covering a general period of 2020-2024. State and non-governmental organisations (NGO) work actively to combat THB in general as challenges persist.

The report highlights that marginalised groups, in general, are vulnerable to traffickers and that victims predominantly originate from either Eastern Europe or the Global South, with some trends emerging of an increase of domestic victims and perpetrators in the CBSS Member States. The developed modus operandi of traffickers and the emergence of new arenas have contributed to challenges faced among stakeholders in prevention, identification, and prosecution. Rapid technological advancements and the continued growth of the online sphere within THB for the purpose of sexual exploitation have shortened the step to exploitation for sexual purposes. Stakeholders are actively combating these new developments through policy and legislation, with increased practical efforts identified as needed.

The findings of the report are based on roundtable discussions and interviews with active key state, NGO, and international non-governmental organisation (INGO) stakeholders as well as secondary data and information. The geographical scope of the report is the CBSS Member States: Denmark, Estonia, Finland, Germany, Iceland, Latvia, Lithuania, Norway, Poland, and Sweden. The analysis was conducted using an information saturation grid to identify common trends, dynamics, challenges, and good practices in the member states. It identified both similarities and differences among the CBSS Member States in terms of approaches to demand-discouraging initiatives, and approaches to ensuring effective access to rights and remedies for all victims, including LGBTQIA+¹, and youth. Furthermore, the report has contributed to sharing specific good practices across the member states for others to duplicate or to be inspired by.

This report aims to enhance the understanding of the current dynamics of THB for the purpose of sexual exploitation and to assess the effectiveness of legislative and practical measures among the CBSS Member States concerning this issue. Highlighting underreported issues of youth and LGBTQIA+ and understanding specific issues and good practices related to ensuring effective access to rights and remedies for victims of THB have been central. The report also highlights the work and discussions ongoing in the member states regarding demand-discouraging initiatives.



This report analyses trafficking in human beings for sexual exploitation in the Baltic Sea Region (2020–2024), highlighting the vulnerability of marginalised groups, evolving trafficking methods and online arenas, national and regional responses, and good practices among CBSS Member States, with particular attention to youth, LGBTQIA+ victims, and demand-reduction initiatives.

1 *Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, Asexual*

KEY FINDINGS

A change in arenas accelerated due to the COVID-19 pandemic restrictions has shortened the step for perpetrators to exploit youth and minors sexually. Moving from more public places to more hidden spaces has made it possible for THB for the purpose of sexual exploitation to stay more hidden than before, increasing vulnerabilities within this group, including individuals identifying as LGBTQIA+.

Discouraging the demand that fosters sexual exploitation remains a critical issue across the CBSS Member States as formulated through key international policy and legislation. How and why demand ought to be discouraged across the member states remains a challenge, with limited national unity on ways forward. Irrespective of the legislative model in place in the member states, there is a need for increased efforts beyond legislation to tackle this issue.

Ensuring low-threshold services for victims of THB to effectively access their entitled rights and remedies is critical and highlighted as good practice. Despite this, victims often face high thresholds, as stakeholders face challenges in proactivity within a fragmented or complicated support system. High thresholds are particularly evident for migrant victims of THB exploited for sexual purposes in the CBSS Member States.

THB for the purpose of sexual exploitation is overall perceived as a heteronormative practice, an understanding that needs updating. There is likely a significant hidden number in the Baltic Sea Region of LGBTQIA+ persons, trans, gay, lesbian, and bisexual, sexually exploited through THB. Increased efforts are needed among THB stakeholders to ensure protection and support for this group.

Abbreviations

CBSS – Council of the Baltic Sea States

CEDAW – The UN Convention on the Elimination of all Forms of Discrimination against Women

CoE – Council of Europe

CoE Trafficking Convention – Council of Europe Trafficking Convention on Action against Trafficking in Human Beings

EU – European Union

EU Anti-Trafficking Directive – Directive 2011/36/EU

GRETA – The Group of Experts on Action against Trafficking in Human Beings

ILO – International Labour Organisation

Istanbul Convention – The Council of Europe Convention on preventing and combatting violence against women and domestic violence

LGBTQIA+ – evolving acronym that stands for lesbian, gay, bisexual, transgender, queer/questioning, intersex, asexual

NAP – National Action Plan

NGO – Non-Governmental Organisation

NRM – National Referral Mechanism

OSCE – the Organisation for Security and Co-operation in Europe

Palermo Protocol – United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children

TF-THB – Task Force against Trafficking in Human Beings (at the CBSS)

THB – Trafficking in Human Beings

UN – United Nations

UNODC – United Nations Office on Drugs and Crime

UN OHCHR – Office of the United Nations High Commissioner for Human Rights

Explanations

Victim or survivor – The CBSS Task Force against Trafficking in Human Beings (TF-THB) uses the term ‘victim’ for this report. Victim is the internationally recognised legal term of the group sometimes mentioned or referred to as survivors. For this report, victims refer to victims of trafficking in human beings for the purpose of sexual exploitation. As such, the CBSS TF-THB acknowledges the use of survivor as a term of this group but uses victim due to being a legal term.

Marginalisation and vulnerability – This report frequently uses the terms marginalised or marginalisation to understand the THB victim backgrounds. Marginalising factors discussed are sexual, economic, social, cultural, and cognitive. Sexual marginalising factors primarily relate to marginalisation due to identifying as LGBTQIA+. This group is often discriminated against and might have more limited possibilities of accessing employment due to their sexual identity. Economic marginalising factors often relate to economic hardship, debt, or lack of labour opportunities to generate income. Social marginalising factors include, for example, substance abuse or sexual abuse experienced by the victim. Cultural marginalising factors focus on issues around cultural stigmatisation or cultural prohibitions that might be practiced in some communities. Cognitive marginalisation in this report often relates to cognitive disabilities, such as intellectual disability, autism spectrum disorders, or severe, persistent mental illness. All these marginalising factors contribute to a person’s vulnerability, as a person by themselves is not vulnerable.

INTRODUCTION

The internationally recognised definition of trafficking in human beings (THB) is the recruitment, transportation, transfer, harbouring, or receipt of people through force, fraud, or deception, intending to exploit them for profit. THB involves the exploitation of a person by someone else, often for sexual or labour purposes, as well as forced criminality, organ removal, or marriage.² Victims of THB for the purpose of sexual exploitation in the Council of the Baltic Sea States (CBSS) member states are predominantly women and girls, with a global increase in sexual exploitation of men and boys noted.³ Migrant victims are the main group exploited for sexual purposes in the Baltic Sea Region, often originating from Eastern Europe, or the Global South. Victims of THB often come from marginalised backgrounds and have faced economic, social, cultural, or cognitive challenges before their exploitation.

The 2024 United Nations Office on Drugs and Crime (UNODC) Global Trafficking in Persons report states, using data from 2022, that 61% of all victims of THB globally are women and girls, including all forms of exploitation. Within these groups, 66% of all women and 60% of all girls were exploited for sexual purposes. Globally, 72% of all convictions for THB involve sexual exploitation, but with a reported increase in the identification of labour exploitation.⁴ The CBSS Member States have over the past years been identifying an increasing number of THB victims exploited for the purpose of labour, while the cases of THB for the purpose of sexual exploitation have either remained stable or increased as well. This is accredited to successful capacity-building initiatives across the states, rather than a significant decrease in identified or presumed cases of THB for the purpose of sexual exploitation.^{5 6} Rather, it has been widely noted that the vulnerability of girls and women have increased over the past years due to rapid technological advancements and approaches by human traffickers, as marginalised groups facing heightened risks of being exploited for sexual purposes through THB.⁷

With a specific focus on highlighting THB for the purpose of sexual exploitation in the Baltic Sea Region, this report will contribute to an updated understanding of the trends and dynamics of this issue in the member states. The report includes four main themes: **access to rights and remedies** for victims of THB, **demand, youth, and LGBTQIA+**.

All CBSS Member States have through their engagement in the United Nations (UN), the European Union (EU), and the Council of Europe (CoE) agreed to ensure protection and available rights and remedies for victims of THB. The minimum standards of rights and remedies to victims of THB across the CBSS Member

2 UN OHCHR, 'Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime, UN General Assembly resolution 55/25', 2000

3 UNODC, 'The 2024 UNODC Global Report on Trafficking in Persons', United Nations, 2024

4 UNODC, 'The 2024 UNODC Global Report on Trafficking in Persons', United Nations, 2024

5 Migration Data Portal, 'Human Trafficking', 2024

6 The Counter Trafficking Data Collaborative, 'CTDC Global Synthetic Data on Trafficked Persons Dashboard', 2022

7 OSCE, 'Discouraging the Demand that fosters trafficking for the purpose of sexual exploitation', 2021

States are formulated through the CoE Trafficking Convention on Action against Trafficking in Human Beings (the CoE Trafficking Convention) and aim at ensuring that victims can be rehabilitated and reintegrated into society and avoid revictimisation. Through the same international cooperation, the CBSS Member States have agreed to discourage the demand that fosters trafficking for the purpose of sexual exploitation. This was recently specified and formulated in the amended EU Directive 2011/36/EU (the EU Anti-Trafficking Directive) as well as in the Palermo Protocol and the CoE Trafficking Convention. Differences in approach to both ensuring effective access to rights and remedies and discouraging the demand that fosters sexual exploitation are evident throughout the Baltic Sea Region. The differences are often due to either the legislative model followed by the state or the initiatives that complement legislation.

THB for the purpose of sexual exploitation is a gendered issue but widely understood as heteronormative. In this system, men are the perpetrators, the trafficker or user of sexual services from a sexually exploited THB victim, and where a heterosexual woman is the victim of sexual exploitation. This report highlights why this narrow understanding needs to be updated through an intersectional approach to understanding vulnerability. Youth, persons aged 15-24, and LGBTQIA+ persons are all reported to be victims of THB. Men predominantly are the perpetrators in the Baltic Sea Region, while some states have noted an increase of female perpetrators. Within each victim group, there are specific marginalising factors contributing to their vulnerability to being exploited by perpetrators. With the ever-increasing use of the Internet as an arena of both exploitation and recruitment, the step of being exploited is shorter than before.

Following this introduction section, the report will briefly explain the methodology and scope of this report, highlighting the geographical and thematic scope, and the information-gathering activities. The analysis section is divided into the following sections:

- Legislation and Policy Framework
- Data Overview and Gaps
- Overview: Trends and Dynamics
- Prevention and Victim Protection
- Access to Rights and Remedies
- Demand
- Youth
- LGBTQIA+

After this, good practices from across the CBSS Member States will be presented before the conclusion and recommendations for future research focus. An Appendix is included at the end of the report, consisting of country profiles of each CBSS member state, focusing on Legislation and Initiatives, Trends and Dynamics, and Rights and Remedies.

SCOPE AND METHOD

The geographical scope of this report is all CBSS Member States: **Denmark, Estonia, Finland, Germany, Iceland, Latvia, Lithuania, Norway, Poland, and Sweden**. Key information on legislation and national initiatives, trends and dynamics, and rights and remedies on the national level are available through *Appendix: Country Profiles*. The general timeframe used for the information gathering activities for this report has been five years, from 2020 to 2024.

This report is based on primary and secondary sources and information. An extensive literature review has been undertaken that covered national, regional, and global trends and dynamics, as well as key academic literature and expert reports from and including the CBSS Member States. Primary information has been gathered through roundtable discussions and Key Informant (KI) interviews. These activities have been undertaken in collaboration with the CBSS TF-THB members, NGOs, independent national rapporteurs, and other key stakeholders involved in national or regional efforts to combat THB.

The CBSS TF-THB has been active in reaching out to key stakeholders and experts on the sub-topics of this report, LGBTQIA+, youth, and access to rights and remedies. Through collecting information from a variety of actors, the objective has been to ensure that existing knowledge of central stakeholders is reproduced and analysed through this report.

The analysis has been carried out using an information saturation grid. Through this, discussion topics and points raised in each of the roundtable discussions and interviews have been collated. Main themes have become evident, related to the scope of this report during this process. The main themes are represented at the regional level throughout the analysis with specific references to states added where appropriate.

1

LEGISLATION AND POLICY FRAMEWORK

1.1. PALERMO PROTOCOL

The Palermo Protocol, introduced by the Office of the United Nations High Commissioner for Human Rights (UN OHCHR) defines THB and provides states with obligations to “*prevent, suppress, and punish trafficking in persons*”. Trafficking is defined through Article 3 as ‘the recruitment transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation’.⁸ Thus, trafficking should be understood as someone taking advantage of another person for the benefit of themselves, with an impact that could be e.g. physical, mental, economic, or materialistic, on the person taken advantage of.

The Palermo Protocol breaks down trafficking into three elements: 1) the act, or the *what*, ‘recruitment, transportation, transfer, harbouring, or receipt of persons’; 2) the means, or the *how*, ‘threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person’; and 3) the purpose, or the *why*, ‘for the purpose of exploitation’, which at a minimum means the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. Through the Protocol, all UN member states are bound to a) prevent and combat trafficking in persons, paying particular attention to women and children; b) protect and assist the victims of such trafficking, with full respect for their human rights; and c) promote cooperation among States Parties to meet those objectives.⁹ This means that each state shall adopt legislative measures criminalising the aspects of trafficking mentioned through Article 3, including those accompanying in the crime and those organising trafficking for others to act on.¹⁰

Since its introduction, the Palermo Protocol has provided the internationally accepted definition of trafficking while binding states parties to establish policies, programmes, or other measures to prevent and combat THB and to protect victims of THB, especially women and children, from revictimisation.

8 UN OHCHR, ‘Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime, UN General Assembly resolution 55/25’, 2000

9 UN OHCHR, ‘Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime, UN General Assembly resolution 55/25’, 2000

10 Danna, D., ‘Report on prostitution laws in the European Union’, Università degli Studi di Milano, 2013, updated 2014

1.2. EUROPE AND THE BALTIC SEA REGION

Most CBSS Member States are EU Members, and all are part of the CoE, both of which have established wide-ranging legal instruments for states to tackle THB.

1.2.1. Council of Europe

All CBSS Member States are part of the CoE, which has since the late 1980s been providing its member states with theoretical and legal baselines for THB. CoE holds a key role as human rights policy stakeholders globally and especially related to THB for the purpose of sexual exploitation. CoE has established that for crimes related to THB for the purpose of sexual exploitation, women are the main victim group, and the crime is closely linked to violence against women, sex tourism, domestic work, and migration, providing legislators with a clearly gendered understanding of what THB is. Since 1990, the CoE have provided member states with recommendations aiming to establish new policies to tackle THB, both internationally and nationally across the member states.¹¹

The CoE set new standards for legislation on THB globally and in its 46 member states through the establishment of the CoE Trafficking Convention in 2005. The CoE Trafficking Convention was the first legal instrument to frame THB as a violation of human rights, and thus a matter of human rights protection.¹² THB is defined through the CoE Trafficking Convention as ‘the recruitment, transportation, transfer, harbouring, or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation’. Within the definition of exploitation, the CoE Trafficking Convention includes ‘the exploitation of the prostitution of others or other forms of sexual exploitation’.¹³ The CoE Trafficking Convention, compared to previous legislative instruments, labelled THB as a human rights issue, as it “entails the violation of women’s dignity and integrity, their freedom of movement and, in some cases, their right to life”.¹⁴ In establishing this, the CoE has provided member states with specific requirements for the protection and assistance of those forcibly trafficked or prostituted, with a special gender equality focus. This human rights approach, in comparison to other legal approaches to trafficking, means that victims of THB are *entitled* to state support and assistance, not that they *deserve* it.^{15 16 17} Furthermore, compared to the Palermo Protocol, the CoE

11 Council of Europe Recommendations: Recommendation 1325, Recommendation 1450, Recommendation 1545, Recommendation 1610

12 Planitzer, J. & Sax, H., ‘A Commentary on the Council of Europe Convention on Action against Trafficking in Human Beings’, Elgar Publishing, 2020

13 Council of Europe, ‘The Council of Europe Convention against Trafficking in Human Beings’, 2005

14 Planitzer, J. & Sax, H., ‘A Commentary on the Council of Europe Convention on Action against Trafficking in Human Beings’, Elgar Publishing, 2020

15 Council of Europe, ‘The Council of Europe Convention against Trafficking in Human Beings’, 2005

16 Planitzer, J. & Sax, H., ‘A Commentary on the Council of Europe Convention on Action against Trafficking in Human Beings’, Elgar Publishing, 2020

17 Planitzer, J., ‘GRETA’s First Years of Work: Review of the monitoring of implementation of the Council of Europe Convention on Action against Trafficking in Human Beings’, Anti Trafficking Review, 2012

Trafficking Convention includes developed and more wide-ranging demands on states to establish national coordination between stakeholders and actors responsible for preventing and combatting trafficking in human beings, which could consist of civil society organisations (CSO), state agencies such as Migration, Tax, and Gender Equality agencies, law enforcement, and legislative bodies.^{18 19} Within this, states should establish and/or strengthen policies and programmes to prevent trafficking as well as discourage the demand that fosters all forms of exploitation, including for sexual purposes.²⁰

The CoE Trafficking Convention entered into force for all signatory states in 2008. It includes requirements on states to establish legal frameworks criminalising all forms of THB, whether national or international, and whether linked to organised crime or not. The CoE Trafficking Convention covers THB for the purpose of sexual exploitation, forced labour, servitude, and the forced removal of organs through a child-sensitive approach. One of the CoE Trafficking Convention's objectives is to provide member states with a comprehensive and cohesive legal framework to protect the rights of victims and to clarify what is expected of states in terms of victim assistance through, for example, compensation for both material (e.g. expenditures) and non-material (suffering) damage, legal assistance, and access to information. Each state is also bound to ensure that victims of THB have access to legal assistance and free legal aid "under the conditions provided by its internal law" (Article 15, Paragraph 2). Thus, the CoE Trafficking Convention puts demands on states to provide victims of THB with rights and access to remedies when identified. Signatories are expected to cooperate and coordinate to ensure effective combatting of THB within and between states.²¹

For states to follow the CoE Trafficking Convention, the CoE established a monitoring mechanism, the Group of Experts on Action against Trafficking in Human Beings, GRETA. Through this mechanism, the CoE provides member states with yearly revisions on progress made and recommendations on what Convention State Parties need to do further to meet the requirements to implement the CoE Trafficking Convention. Through different areas of focus each evaluation round, states are monitored on a periodic basis every 4 to 5 years.²² This monitoring and evaluation of state activities to prevent trafficking is a key aspect of what makes the CoE Trafficking Convention stand out compared to the Palermo Protocol or EU directives, as these do not mandate any external evaluation.²³

1.2.2. Children and Youth

Since 2007, the CoE has established a legal framework for its member states through the CoE Trafficking Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (the Child Protection Convention). This convention covers children, thus people under the age of 18 years. This convention is of relevance as this report covers the situation of youth (15-25 years)

18 Council of Europe, 'The Council of Europe Convention against Trafficking in Human Beings', 2005

19 Planitzer, J. & Sax, H., 'A Commentary on the Council of Europe Convention on Action against Trafficking in Human Beings', Elgar Publishing, 2020

20 Council of Europe, 'The Council of Europe Convention against Trafficking in Human Beings', 2005

21 Council of Europe, 'The Council of Europe Convention against Trafficking in Human Beings', 2005

22 Council of Europe, 'The Council of Europe Convention against Trafficking in Human Beings', 2005

23 Planitzer, J., 'GRETA's First Years of Work: Review of the monitoring of implementation of the Council of Europe Convention on Action against Trafficking in Human Beings', Anti Trafficking Review, 2012

in the Baltic Sea Region. The Child Protection Convention serves to cover the crimes of sexual exploitation through prostitution and child pornography, both of which are examples of ways youth are sexually exploited through THB.²⁴ Article 9 states that each member state should “encourage the participation of children [...] in the development and implementation of state policies, programmes, or other initiatives covering the fight against sexual exploitation and sexual abuse of children” as well as encourage the private sector to actively work to prevent such crimes against children.²⁵ In a time with technological advancements at a rapid scale, states need to ensure that both the users (children, youth) and the service providers (tech companies) work actively together with states to prevent criminality and protect children and youth from predatorial behaviour online. Furthermore, states ought to ensure assistance to victims through co-operation between state actors and non-governmental organisations, so that assistance services are both available and accessible to victims.

Through its articles 18-24, the Child Protection Convention provides member states with examples of conduct to be criminalised through legislative or other measures. The criminal acts mentioned, child sexual abuse, child prostitution, child pornography, corrupting children for sexual acts, soliciting or grooming children, and aiding or abetting any of the previously mentioned crimes, are all related to the criminal offenses connected to THB for the purpose of sexual exploitation.²⁶ While crimes against children and adults are met with different legislative frameworks, the similarities and connections of the type of crime committed are evident through the links between the CoE conventions to prevent these types of crimes. In providing legal measures for prevention, criminalisation, and victim protection and assistance, the Child Protection Convention aims to ensure a holistic approach for states to combat THB in children and young people.

1.2.3. European Union

The European Union holds a key role in anti-trafficking work across Europe and the Baltic Sea Region through its 27 member states. While all CBSS Member States are part of the CoE, all except for Iceland and Norway are part of the EU. Trafficking in the EU is prohibited through Article 5 of the Charter of Fundamental Rights of the European Union, which also states that ‘no one shall be held in slavery or servitude’ and that ‘no one shall be required to perform forced or compulsory labour’.²⁷ Since its establishment, the EU has developed and agreed upon several directives and amendments to combat trafficking. Like the CoE Trafficking Convention, the EU directives to combat THB place a specific focus on women and children in its frameworks, thus providing an understanding of THB as gendered. Up until 2011, EU anti-trafficking law consisted of three instruments:

- Council Framework Decision 2001/220/JHA on the standing of victims in criminal proceedings,
- Council Framework Decision 2002/629/JHA on combatting trafficking in

24 Council of Europe, ‘[Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual abuse](#)’, 2007

25 Council of Europe, ‘[Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual abuse](#)’, 2007

26 Council of Europe, ‘[Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual abuse](#)’, 2007

27 European Parliament, ‘[Charter of fundamental rights of the European Union](#)’, EU, 2000

human beings,

- Council Directive 2004/81/EC on the residence permit issued to third-country nationals who are victims of trafficking who cooperate with competent authorities.

Through the 2002 EU Council framework decision on combatting THB, the EU adopted its first legislative initiative addressing THB with a minimum set of rules concerning the definition of the criminal offence of THB. The framework decision included a specific focus on the prosecution of traffickers and sanctions against organisations involved in THB.²⁸ Since then, the member states have agreed to several directives and regulations focusing on providing victims of THB with mental and physical support and legal advice as well as a general recognition of their status as crime victims.^{29 30 31} These instruments reportedly “lacked the application, enforcement, and comprehensive approach necessary to prevent trafficking and protect victims”.³² In replacement, EU member states agreed on Directive 2011/36/EU, or the EU Anti-Trafficking Directive, which aims at preventing and combatting trafficking through a set of minimum rules for states to follow. The set includes legislative measures on the criminalisation and investigation of human trafficking, support and protection of victims, and efforts to prevent human trafficking.³³

While all CBSS Member States are part of the CoE, all except for Iceland and Norway are part of the EU. In 2011, the EU and the member states, established the thus far most wide-ranging legislative in the EU to combat THB through the Anti-Trafficking Directive. Through this, the EU extended the definitions of THB-related crimes to be punishable, while emphasising the protection and assistance of victims, and the establishment of a non-punishment approach for victims of THB for crimes they were forced to commit by their traffickers. Through the EU Anti-Trafficking Directive, member states were required to appoint national rapporteurs or equivalent mechanisms to monitor the implementation of anti-trafficking policies.³⁴ The national rapporteur’s objectives should be to monitor and analyse the scope and scale of trafficking in EU states. Many member states’ rapporteurs produce annual reports, providing the public and stakeholders with information on key trends and information, and recommendations for future anti-trafficking initiatives. Furthermore, in ensuring that victims can access support mechanisms, such as legal, psychological, and healthcare, the EU Anti-Trafficking Directive requests that Member states cooperate with key NGO or CSO stakeholders.³⁵ This provides member states with a modus operandi on

28 The Council of the European Union, ‘[Council Framework Decision of 19 July 2002 on combating trafficking in human beings](#)’, EU, 2002

29 The European Parliament & the Council of the European Union, ‘[Regulation \(EU\) No 606/2013 of the European Parliament and of the Council of 12 June 2013](#)’, EU, 2013

30 The Council of the European Union, ‘[Council Directive 2004/81/EC of 29 April 2004](#)’, 2004

31 The European Parliament & the Council of the European Union, ‘[Directive 2012/29/EU of 25 October 2012](#)’, EU, 2012

32 ECPAT, ‘[Directive 2011/36EU on Preventing and Combating Trafficking in Human Beings and Protecting its Victims](#)’

33 The European Parliament & the Council of the European Union, ‘[Directive 2011/36/EU of 5 April 2011](#)’, EU, 2011

34 The European Parliament & the Council of the European Union, ‘[Directive 2011/36/EU of 5 April 2011](#)’, EU, 2011

35 The European Parliament & the Council of the European Union, ‘[Directive 2011/36/EU of 5 April 2011](#)’, EU, 2011

how to effectively work against THB, raise awareness, and ensure collaboration within the field to protect human rights. Organisational collaboration ought to be seen as vital in an ever-evolving THB landscape, in the CBSS Member States, and beyond.

The Proposal for an amendment of the Anti-Trafficking Directive was agreed upon by member states in 2024. Through updating the EU Anti-Trafficking Directive, the EU committed to continued anti-trafficking initiatives and providing a broader definition of what crimes could be trafficking, such as surrogacy. The amendment also aims to support states with more effective tools to handle the technical advancements within the field, as more THB-related crimes increase online, and decrease in more traditional arenas, such as the streets. Part of this includes that member states are urged to enhance national data collection and reporting efforts to ensure critical actors can better understand emerging trends of THB, both nationally and at the EU level.³⁶ As a result, States could see the benefit of increased public awareness, better cross-organisational collaboration, and ensuring that measures are accurate and relevant to the crime and victims. Another key aspect of the amendment is that the EU obliges member states to focus on demand-discouraging and reduction activities related to all forms of exploitation, including sexual exploitation. Moreover, the amendment provides states with strengthened measures to protect and support victims, with provisions to ensure better access to rights and remedies for victims of THB as well as the establishment of national referral mechanisms to ensure that state actors can identify and support victims and collaborate with appropriate civil society actors to ensure appropriate assistance.³⁷

In the Recitals 26 and 27 of the amended EU Anti-Trafficking Directive, the EU legislators call for the development of a 'coherent policy response to tackle demand that fosters' THB and to 'further reinforce and harmonise the criminal justice efforts across member states to reduce demand', stating the importance of member states criminalising the use of services 'where the victim is exploited to render such services and the user of the services knows that the person providing the services is a victim' of THB.³⁸ Thus, through this amendment, the EU calls for member states to include what is defined as 'knowing use' in national legislation to discourage demand.

1.2.4. The Istanbul Convention

The Council of Europe Convention on preventing and combatting violence against women and domestic violence, or the Istanbul Convention, has been ratified by all CBSS Member States thus far except for Lithuania. Established in 2011, the Istanbul Convention condemns all forms of violence against women and domestic violence while recognising that violence against women is a 'manifestation of historically unequal power relations between women and men which have led

36 European Parliament, '[European Parliament legislative resolution of 23 April 2024 on the proposal for a directive of the European Parliament and of the Council amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims](#)', EU, 2024

37 European Parliament, '[European Parliament legislative resolution of 23 April 2024 on the proposal for a directive of the European Parliament and of the Council amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims](#)', EU, 2024

38 European Parliament, '[European Parliament legislative resolution of 23 April 2024 on the proposal for a directive of the European Parliament and of the Council amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims](#)', EU, 2024

to domination over, and discrimination against, women by men', and that this has prevented 'the full advancement of women' in societies across the world. The Istanbul Convention aimed at both describing the structural discrimination against women and how gender-based violence should be understood in terms of women's general subordination socially, juridically, economically, and culturally, compared to men.³⁹ The Istanbul Convention, in similarity to the CoE Trafficking Convention, provides CoE member states with an understanding that violence against women ought to be seen as a violation of women's human rights. An important part of the Istanbul Convention, and relevant to this report, is how the Istanbul Convention echoes the Palermo Protocol and the CoE Trafficking Convention when defining what violence against women is. It is stated that violence against women and the gender-based nature of the violence commonly result in physical, psychological, economic, or sexual harm or suffering to women. Recognising the CoE Trafficking Convention, the Istanbul Convention provides member states with a definition that sexual exploitation, for example, through THB, is a type of violence against women ratifying states are obliged to fight through legislation. It is defined that violence against women can include sexual violence, or arbitrary deprivation of liberty (both common practice in THB in the Baltic Sea Region) due to threats or sexual violence or through coercion.⁴⁰

39 Council of Europe, '[Action against violence against women and domestic violence – Istanbul Convention](#)', 2011'[Action against violence against women and domestic violence – Istanbul Convention](#)'[Action against violence against women and domestic violence – Istanbul Convention](#)'

40 Council of Europe, '[Action against violence against women and domestic violence – Istanbul Convention](#)', 2011

1.3. RIGHTS AND REMEDIES

Availability and effective access to rights and remedies for victims of THB are constituted through various international frameworks and initiatives. Through articles 2, 6, 7, and 9 in the Palermo Protocol, it is intended that signatory states ought to ensure that “victims are treated with full respect for their human rights and offered a comprehensive range of remedies”.⁴¹ As trafficking is recognised as a human rights violation through the CoE Trafficking Convention states are obliged to ensure there are available rights and remedies for THB victims. For the CBSS Member States, the already mentioned frameworks, the CoE Trafficking Convention and connected recommendations, and the EU Anti-Trafficking Directive, reaffirm the right to effective remedy codified through the Palermo Protocol. Through articles 12-16, the CoE Trafficking Convention provides ratifying states with comprehensive provisions on expectations of effective remedies for THB victims. These include access to safe shelter, compensation, medical, and material assistance, counselling and free legal aid. The CoE Trafficking Convention is also the only international legally binding instrument that contains an obligation to grant a minimum recovery period of 30 days for victims.⁴² The Anti-Trafficking Directive amendment of 2024 includes updated expectations on states to ensure effective assistance and support to both adult and child victims of THB. The amended Directive also provides states with suggestions of establishing a national victims fund, or similar, to ensure victims are compensated should states be unable to obtain this from the traffickers.⁴³ The EU Anti-Trafficking Directive further provides member states with obligations to ensure access to rights and remedies in line with both the CoE Trafficking Convention and UN general guidelines as to what an effective remedy would be.

In 2023, the CoE Committee of Ministers to member states on rights, services, and support for victims of crime updated recommendations on how the CoE member states should assist victims of crime in general. The updated recommendations included the right to remedy through Article 16 stating that ‘victims may need to seek appropriate civil remedies to protect their rights following a crime’. This should at least include ‘the right access to competent courts or other authorities’ and ‘legal aid in appropriate cases.’⁴⁴

The UN General Assembly’s Basic Principles on the right to an effective remedy for victims are:

Restitution and rehabilitation ought to include physical and mental medical care, legal and social services, safe shelter, and for victims’ willingness to co-operate in legal proceedings. It should include the restoration of a person’s liberty and personal freedom and for victims to be released from detention. The victim ought to be able to enjoy human rights and to be reunited with family members (if relevant), to access safe and voluntary repatriation, or if required to access

41 UN General Assembly, ‘Basic principles on the right to an effective remedy for victims of trafficking in persons, Annex to the Report by the Special Rapporteur on Trafficking in Persons, especially women and children, Joy Ngozi Ezeilo, 2014 (A69/33797)

42 Council of Europe, ‘The Convention on Action against Trafficking in Human Beings’, 2005

43 European Parliament, ‘[European Parliament legislative resolution of 23 April 2024 on the proposal for a directive of the European Parliament and of the Council amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims](#)’, 2024

44 Council of Europe, ‘[Recommendation CM/Rec\(2023\)2 of the Committee of Ministers to member states on rights, services and support for victims of crime adopted on 15 March 2023 and its Explanatory Memorandum](#)’, 2023

temporary or permanent residence status, refugee status, or third-country resettlement when applicable. Furthermore, the victim's legal identity and citizenship should be recognised, and they should have any potential employment restored. States are also obliged to facilitate social integration or reintegration as part of resettlement. Lastly, victims ought to have any lost or stolen property returned, such as identity or travel documents.⁴⁵

Compensation could be received either from state compensation or from the perpetrator and it may cover any damages for physical or mental harm, for lost opportunities such as employment, education, and social benefits. Victims should also be reimbursed for transportation, childcare or housing costs, material damages, and loss of earnings. Due to the nature of the THB crime, victims should also be entitled to moral and non-material damages, to be reimbursed for legal fees and costs associated with criminal justice proceedings.⁴⁶

Satisfaction includes measures aimed at stopping continued violations towards a victim as well as the official declaration or juridical decision restoring a victim's dignity, rights, and reputation which could include public apologies, sanctions against perpetrators, and full public disclosure of facts and truths.⁴⁷

Guarantees of non-repetition or revictimisation ought to include that states ensure effective investigations, prosecutions, and sanctioning of traffickers and that they oblige all measures necessary to protect victims from being re-trafficked. This includes capacity building of relevant stakeholders and modifying practices in society that might cause, sustain, or promote tolerance to THB, such as gender-based discrimination or violence.⁴⁸

The CoE Trafficking Convention through its Article 12, Assistance to Victims, puts obligations on states to ensure that legislative measures are in place to assist victims in their "physical, psychological and social recovery." As listed in the CoE Trafficking Convention, these initiatives ought to include at least:

- Standards of living capable of ensuring their subsistence, through such measures as appropriate and secure accommodation, psychological and material assistance
- Access to emergency medical treatment
- Translation and interpretation services, when appropriate
- Counselling and information, in particular as regards their legal rights and the services available to them, in a language they can understand
- Assistance to enable their rights and interests to be represented and considered at appropriate stages of criminal proceedings against offenders
- Access to education for children

Article 13 constitutes the recovery and reflection period that should be at least 30 days in instances where there are reasonable grounds to believe that a person is a THB victim. Article 14 states that ratifying states ought to issue

45 UN General Assembly, 'Basic principles on the right to an effective remedy for victims of trafficking in persons, Annex to the Report by the Special Rapporteur on Trafficking in Persons, especially women and children, Joy Ngozi Ezeilo, 2014 (A69/33797)

46 UN General Assembly, 'Basic principles on the right to an effective remedy for victims of trafficking in persons, Annex to the Report by the Special Rapporteur on Trafficking in Persons, especially women and children, Joy Ngozi Ezeilo, 2014 (A69/33797)

47 UN General Assembly, 'Basic principles on the right to an effective remedy for victims of trafficking in persons, Annex to the Report by the Special Rapporteur on Trafficking in Persons, especially women and children, Joy Ngozi Ezeilo, 2014 (A69/33797)

48 UN General Assembly, 'Basic principles on the right to an effective remedy for victims of trafficking in persons, Annex to the Report by the Special Rapporteur on Trafficking in Persons, especially women and children, Joy Ngozi Ezeilo, 2014 (A69/33797)

a “renewable residence permit to victims”, or a temporary residence permit if authorities consider that their stay is necessary owing to their situation, and/or if authorities consider that their stay is necessary for their cooperation with the competent authorities in the investigation or criminal proceedings.⁴⁹ Aligning with UN General Assembly Basic Principles, the CoE Trafficking Convention also includes that victims have the right to compensation and legal redress and that victims receive information on these rights in the first meeting with authorities. Finally, the state should, in situations where a victim can safely, with dignity and with their rights reserved do so, support the repatriation and return of victims to their country of origin or where they hold a residence permit.⁵⁰

49 Council of Europe, *The Council of Europe Convention against Trafficking in Human Beings*, 2005

50 Council of Europe, *The Council of Europe Convention against Trafficking in Human Beings*, 2005

1.4. GENDERED ASPECTS OF LEGISLATION

Global, European, and regional data shows that THB is a gendered issue, as most victims of forced labour are men and boys, and most victims of THB for the purpose of sexual exploitation are women and girls.^{51 52} These patterns are acknowledged through international legislation and policy. The CoE Convention on Action against Violence against Women and Domestic Violence (the Istanbul Convention) established that THB for the purpose of sexual exploitation ought to be seen as a form of violence against women, to the extent it affects women. This is further reflected in both national and international policy frameworks, conventions, or directives, where, for example, Norwegian legislation and the Child Protection Convention state that domestic violence and THB are closely linked and that victims of THB are often dependents to or know their trafficker since before becoming a victim. This linkage is specifically common in cases where the victim is a woman, and the perpetrator is a man.^{53 54} While this exemplifies specific gendered patterns within THB, it should be noted that men and boys also become victims of THB for the purpose of sexual exploitation and that women sometimes take the role of traffickers or solicitors, with indications of the latter becoming an increased phenomenon in Europe and the Baltic Sea Region, as reported throughout the information-gathering activities for this report.

The EU Anti-Trafficking Directive is clear on the links between gender inequality and discrimination, gender-based violence, and trafficking for the purpose of sexual exploitation, stating that these are the root causes of THB.⁵⁵ Notably, while more recent legal trafficking initiatives, such as the CoE Trafficking Convention and the EU directive 2011/35/EU amendment pay special attention to gender equality as a means to prevent THB, the Palermo Protocol does not include any such statements as a tool to combat trafficking.⁵⁶ Compared to the Palermo Protocol, the amended EU Anti-Trafficking Directive is broader in terms of its gender application, stating that EU member states should take 'into account the gender perspective', not directly providing states with obligations on how far they should ensure gender equality in national policies. Moreover, the 2024 amendment of the Anti-Trafficking Directive states that THB 'can be exacerbated where it intersects with discrimination based on a combination of sex and other grounds of discrimination', calling on member states to pay attention to intersectional discrimination as it could result in increased vulnerability. Special attention, according to the EU, ought to be paid to discrimination on racial and ethnic origin.⁵⁷ This focus can be referenced back to THB for sexual exploitation

51 UNODC, 'Global Report on Trafficking in Persons 2022', 2022

52 Eurostat, 'Victims of trafficking in human beings by citizenship' 2022

53 Council of Europe, 'Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual abuse', 2007

54 Koordineringsenheten mot menneskehandel (KOM), 'Veileder – Identifisering av mulige ofre for menneskehandel', 2024

55 European Parliament, 'European Parliament legislative resolution of 23 April 2024 on the proposal for a directive of the European Parliament and of the Council amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims', 2024

56 Planitzer, J. & Sax, H., 'A Commentary on the Council of Europe Convention on Action against Trafficking in Human Beings', Elgar Publishing, 2020

57 European Parliament, 'European Parliament legislative resolution of 23 April 2024 on the proposal for a directive of the European Parliament and of the Council amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims', 2024

and forced prostitution being racialised, as many victims in the CBSS Member States are migrants from the Global South, as identified in this report.

The historical and current gender inequality and gendered power imbalance have resulted in legislation covering violence against women and girls and international THB legislation being closely connected. Due to gender norms and patriarchal structures, women and girls generally have a more marginalised social, judiciary, and/or economic status compared to men and boys.⁵⁸ The UN Convention on the Elimination of all Forms of Discrimination against Women (CEDAW) was approved in the UN General Assembly in 1979 and provided states with demands on the extinction of discrimination against women both domestically and publicly.⁵⁹ Recommendations following the CEDAW draw connections to the discrimination in criminal law towards women, with regards to prostitution. The Office of the High Commissioner of Human Rights (OHCHR) recommends that states and international legislators address 'gender-based discrimination' when proposing anti-trafficking measures, providing a specific gender-centred baseline for new anti-trafficking initiatives, thus also referencing the inequalities and the gendered dimensions of the trafficking system.⁶⁰ Examples of such initiatives are provided and mentioned in both the EU Anti-Trafficking Directive and the 2024 amendment as well as in the CoE Trafficking Convention through discouraging and reducing the demand for sexual services from victims of THB.

In acknowledging that men and boys are the main perpetrators of trafficking-related crimes and that women and girls are the main victims of trafficking, reducing and discourage the demand that fosters trafficking for the purpose of sexual exploitation, ought to be seen as a gendered issue, relating to change in behaviour and attitude among men and boys. Ratifying states of the CoE Trafficking Convention and the EU Anti-Trafficking Directive are bound to efforts to discourage and reduce demand. Such efforts could be educational and legislative, to achieve societal change in attitudes towards women and girls and challenge gender stereotypes, and harmful traditional, economic, or cultural practices that marginalise women.⁶¹ The European Parliament went further in recent legislative resolutions by recognising that prostitution, forced or not, is a form of violence against women and it called on all member states to decriminalise prostituted persons, provide access to exit pathways, criminalise the purchase of sexual acts and all forms of pimping, as well as implement awareness-raising programmes aimed specifically towards men and young people.⁶² On the other hand, the UN HRC-WG called for full decriminalisation and emphasised that *sex workers* endure arbitrary arrests, violence from both state and private actors, restricted access to healthcare and social services, impediments to justice and exclusion from civic and cultural life.⁶³

58 UN General Assembly, 'Convention on the Elimination of All Forms of Discrimination against Women', 1979

59 UN General Assembly, 'Convention on the Elimination of All Forms of Discrimination against Women', 1979

60 OHCHR, 'Recommended Principles and Guidelines on Human Rights and Human Trafficking, Guidelines 1: Promotion and protection of human rights'

61 Council of Europe, 'Action against violence against women and domestic violence – Istanbul Convention', 2011

62 Alsalem, R., 'Prostitution and violence against women and girls - Report of the Special Rapporteur on violence against women and girls, its causes and consequences', United Nations Human Rights Council, 2024

63 Human Rights Council, Working Group on discrimination against women and girls, <https://docs.un.org/en/A/HRC/WG.11/39/1>, 2024

Of the international legislations CBSS Member States are bound to, the CoE Trafficking Convention provides the most specific guideline for member states through binding states to guarantee gender equality when implementing policies and legislations to combat THB.⁶⁴ Through the special attention paid to marginalised population groups, the European legislative instruments ought to include migrants and refugees, women and children, as well as individuals identifying as LGBTQIA+. Until now, limited attention has been given to individuals identifying as LGBTQIA+ in legislation and policy documents, leaving out important gender dimensions and marginalised groups even though data from several CBSS Member States showing that individuals identifying as LGBTQIA+ are increasingly identified as victims of THB for the purpose of sexual exploitation.^{65 66}

64 Council of Europe, *The Council of Europe Convention against Trafficking in Human Beings*, 2005

65 Committee on the Elimination of Discrimination against Women, *General Recommendation No. 33 on women's access to justice*, 2015

66 Data collection roundtable discussions, August-November 2024

1.5. LGBTQIA+ RIGHTS

LGBTQIA+ persons face increased vulnerability of becoming victims of THB for the purpose of sexual exploitation due to their marginalised position in society, which includes sexual orientation and identity discrimination, and violence. The international anti-trafficking legal framework does not directly address this group's specific vulnerabilities. Instead, international legal protections for LGBTQIA+ individuals in the Baltic Sea Region derive from the general human rights instruments of the UN, Council of Europe, and the European Union.

UN human rights treaties provide general protections against discrimination and violence.⁶⁷ Treaty bodies consistently interpret these to include discrimination and violence based on sexual orientation and gender identity. For example, the Human Rights Committee has urged states to guarantee equal rights to all individuals, regardless of their sexual orientation and gender identity, and to address violence and discrimination against LGBTQIA+ individuals. Additionally, the CEDAW has emphasised that gender-based discrimination impacts women differently depending on their gender identity and sexual orientation and that CEDAW applies to all women, regardless of their sexual orientation or gender identity.⁶⁸ The conclusions of treaty bodies carry political weight, but states parties are not obliged to incorporate them into national law^{69 70}.

At a regional level, both the CoE and the EU have established legal instruments that more explicitly consider discrimination based on sexual orientation and gender identity. Article 14 of the European Convention on Human Rights contains an overarching prohibition of discrimination, and the European Court of Human Rights has confirmed that this applies also to discrimination based on gender identity or sexual orientation.^{71 72} Article 4(3) of the Istanbul Convention prohibits discrimination based on sexual orientation or gender identity.⁷³ EU human rights legislation contains similar non-discrimination clauses: Article 21 of the EU Charter of Fundamental Rights forbids discrimination based on sexual orientation⁷⁴, and the EU Victims Rights Directive asserts that victims of crime may not be discriminated against based on their gender identity or sexual orientation⁷⁵. However, the 2024 amendment of the EU Anti-Trafficking Directive did not acknowledge specific rights or vulnerabilities of individuals identifying as LGBTQIA+.

An example of an initiative aimed at better addressing the experiences of

67 OHCHR, 'Born Free and Equal: Sexual Orientation, Gender Identity and Sex Characteristics in International Human Rights Law', 2019

68 OHCHR, 'Born Free and Equal: Sexual Orientation, Gender Identity and Sex Characteristics in International Human Rights Law', 2019

69 Lesch, M. & Reiners, N., 'Informal human rights law-making: How treaty bodies use 'General Comments' to develop international law', *Global Constitutionalism*, 2023

70 Pribytkova, E. 'Extraterritorial obligations in the United Nations system: UN Treaty Bodies'. In: *The Routledge Handbook on Extraterritorial Human Rights Obligations*, ed. Gibney, M., Türkelli, G.E., Krajewski, M. & Vandenhole, W., *Routledge*, 2022

71 Council of Europe, 'The European Convention on Human Rights', 1950

72 European Court of Human Rights, 'Factsheet – Sexual Orientation Issues', 2023

73 Council of Europe, 'Action against violence against women and domestic violence – Istanbul Convention', 2011

74 European Union, 'Charter of Fundamental Rights of the European Union', 2000

75 The European Parliament & the Council of the European Union, 'Directive 2012/29/EU of 25 October 2012', EU, 2012

LGBTQIA+ individuals within the international human rights legal framework is the Yogyakarta Principles. These principles serve as a guide to the application of international human rights law in relation to sexual orientation and gender identity. One principle addresses human trafficking, affirming that states should ensure that measures to prevent trafficking consider inequality and discrimination based on sexual orientation or gender identity.⁷⁶ While not officially accepted at the UN, CoE, or EU, key UN treaty bodies such as the CEDAW have referenced the principles. The principles have been cited by national and sub-national courts in countries such as Spain and Italy in rulings to strengthen the protection of LGBTQIA+ individuals.^{77 78 79} Thus, these influential principles could contribute to future legislative developments, both nationally and internationally to protect LGBTQIA+ persons.

Overall, there remains a protection gap for LGBTQIA+ individuals, not only in the international legal framework of anti-trafficking but also in international human rights law. While non-legally binding developments have considered how the LGBTQIA+ community is particularly vulnerable to human rights abuses, the current legal framework is limited to a minimum standard prohibiting discrimination based on sexual orientation and gender identity. This gap in legal protection can contribute to increasing the susceptibility of LGBTQIA+ individuals to human trafficking for sexual exploitation, as their specific forms of marginalisation are not adequately considered on the international level.

76 'The Yogyakarta Principles', 2006

77 O'Flaherty, M. 'The Yogyakarta Principles at Ten', *Nordic Journal of Human Rights*, 2016

78 Tribunale di Milano, 'Ordinanza N 40037/2018 RG', 2018

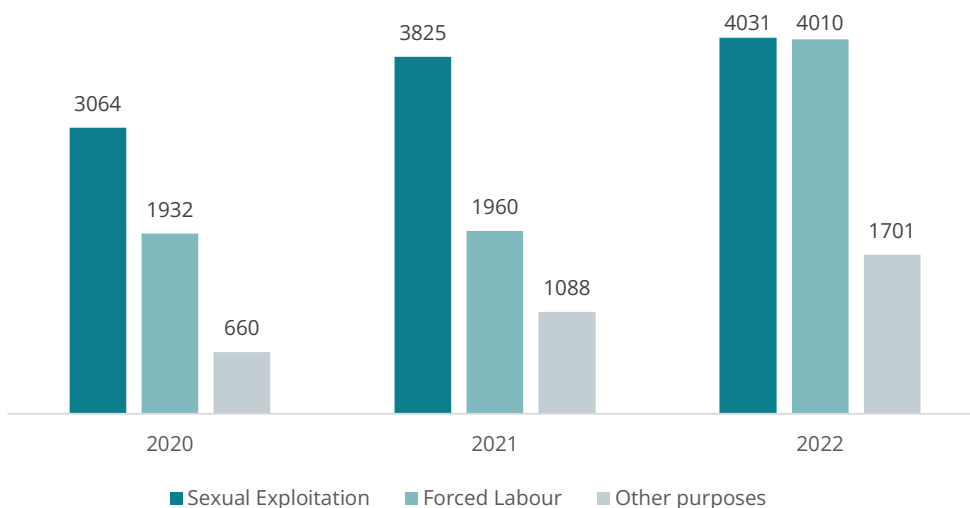
79 Tribunal Constitucional, 'Cuestión de inconstitucionalidad 1595-2016, sobre el artículo 1 de la Ley 3/2007', 2019

2

DATA: OVERVIEW AND GAPS

Eurostat data between 2020 and 2022 (most recent data available as of 31 December 2024) show a general trend of both increased numbers of cases of THB for the purpose of sexual exploitation and labour exploitation (see Table 1). Increased knowledge and capacity of key stakeholders involved in THB across the CBSS Member States on indicators of forced labour have resulted in more victims identified.⁸⁰ Despite this, the numbers of cases of THB for the purpose of sexual exploitation increased between 2020-2022, with indications from key stakeholders that this situation have remained similar up until and throughout 2024, without any data aggregated on the regional level available.

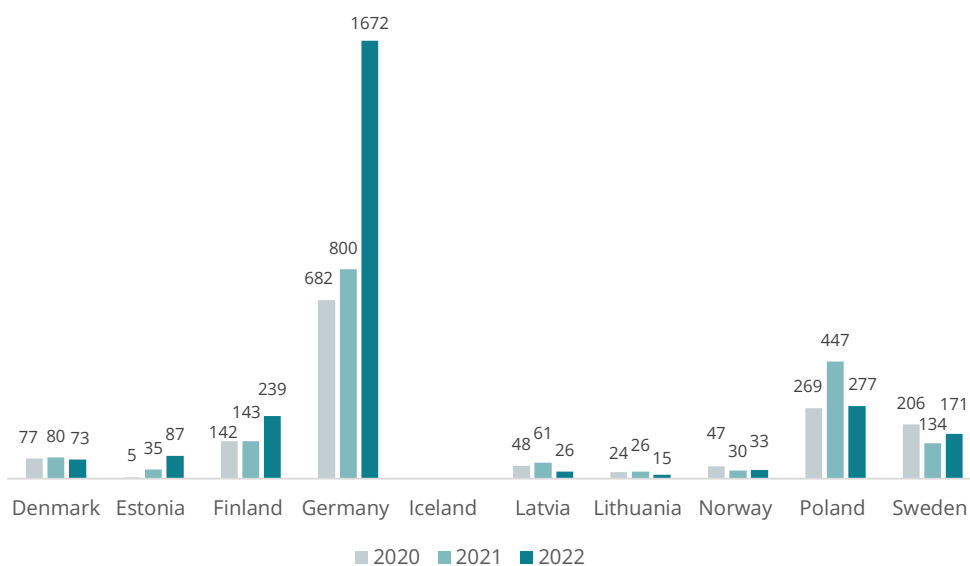
Table 1. Identified cases of THB per type of exploitation, 2020-2022 in the CBSS Member States (Iceland and Norway data sent separately as they are not part of the EU; more recent aggregated data not available).



Based on available region aggregated data, the numbers of identified victims have remained relatively stable in some states over the period 2020-2022, while the identification numbers have fluctuated more in others. Germany saw a peak of identified victims in 2022, with 1672 reported THB victims identified, while Poland saw a general decrease from 447 victims identified in 2021 to 277 identified in 2022 (for further information, see Table 2).

80 Eurostat, [Trafficking in human beings statistics](#), 2024

Table 2. Identified victims of THB in the CBSS Member States between 2020-2022, based on Eurostat data (Iceland and Norway data send separately as they are not part of the EU).



Despite knowing that the available data does not contribute to an overall view of the situation of THB in the CBSS Member States, internationally aggregated and updated data remains a gap in the data landscape for the Baltic Sea Region. Stakeholders acknowledged that the lack of updated data from neighbouring states remains an issue, while some states also acknowledged the need for data conformity and unity nationally. Currently, in many of the CBSS Member States, various stakeholders collect data on different indicators. Identified victims, presumed victims, individuals receiving support from THB specialised NGOs, and court cases involving THB criminality are all different ways data is collected and presented. Coupled with the acknowledgement that there are probable large hidden numbers of THB in each member state, this was understood to contribute to challenges in convincing decision-makers to prioritise THB initiatives and provide sustained or increased resources.

With some good practices underway through specific Independent National Rapporteurs with an overarching responsibility for data production and dissemination, stakeholders called for increased efforts nationally and internationally. Ensuring better data collection and collation between actors, and functions, where currently not established, can ensure stakeholders are able to follow trends and be proactive in their efforts. One actor or function to lead these efforts is generally seen as a good practice, with emphasis on collaboration and cooperation across NGOs and states needed.

3

OVERVIEW: TRENDS AND DYNAMICS

This section will first present and analyse the recent dynamics among the CBSS Member States related to victims, perpetrators, and arenas of THB for the purpose of sexual exploitation as discussed during the roundtable discussions and interviews conducted.

3.1. VICTIMS

Through the information gathering and analysis for this report, it has become evident that the main transit and destination states for victims of THB are situated in the North-West, in the EU, while victims predominantly originate from the Global South or from Eastern European states. As such, the Baltic Sea Region is a clear transit and destination region for victims of THB from across the globe. This section will discuss and analyse the trends as discussed through both primary information gathered and through secondary sources for contextualisation.

3.1.1. Similar victim groups with some recent dynamic changes

Developments and trends in terms of countries of origin of the victims tend to change depending on the movement and activities of criminal networks, wars, armed conflicts and refugee flows, as well as other external factors. The main victim groups as reported across the CBSS Member States are and have been for the past five years at least, Nigerian women, Thai women predominantly working in massage parlours, women from Romania, and Ukrainian women. Despite relative 'stability' in terms of the known victim groups, recent years have seen some slight changes in the dynamics.

Two member states, Estonia and Latvia, reported a general lack of changed dynamics in terms victim trends and developments in their respective states as no increase or decrease in victims has been identified, and other trends have remained the same over the past five years.

3.1.1.1. Nigeria

Women from Nigeria have been present in the CBSS Member States as victims of THB for over a decade and are still present but with some changes to their visibility and identification. This group is often transited through Europe before reaching destination countries in the Baltic Sea Region, with migration agencies reporting they often enter with valid visas but overstay, ending up without legal protection to dwell in the Schengen zone. Nigerian women as victims of THB have been mentioned as the main group in contact with NGOs and state actors prior to the COVID-19 pandemic, but that is less visible in the statistics and through outreach work since.

3.1.1.2. Thailand

Thai women are another group commonly mentioned among at least half of the CBSS Member States as either suspected or identified victims of THB. This

group is predominantly exploited in Thai massage parlours and there are reports from member states that this group is growing in suspected cases each year. Reports from Sweden have stated that it is suspected that around 80% of all Thai massage parlours are de facto brothels, where customers can purchase sex relatively risk-free.⁸¹ Thai women often reportedly arrive to the Baltic Sea Region on regular migration routes, either through tourist visas or through family reunification, as has been reported by stakeholders. Some stakeholders reported that women exploited through massage parlours are offered a very low salary at the establishment with the possibility to 'earn extra money' through selling sexual services. Already in marginalised economic situations the women face external pressure to follow the recommendations to also be able to keep their employment at the massage parlour. The women are often unaware that they are being exploited. While these women are most often identified in connection to massage parlours, they are also exploited through online arenas.

3.1.1.3. EU

Victims from EU and CBSS Member States were mentioned throughout the information-gathering activities for this report. Women from Latvian and Poland were mentioned as presumed or identified victims of THB in discussions with Swedish and Estonian stakeholders, thus not mentioned at a general regional level among stakeholders. To a lesser degree, Bulgaria and Moldova (EU candidate state) were reported as countries of origin for victims of THB for the purpose of sexual exploitation in the Baltic Sea Region, often reported along with Romania. Women from Romania were reported as victims of THB in the majority of the CBSS Member States. This victim group reportedly encounters support NGOs in need of support for severe health issues. Victims from Romania in the region consist of both those identifying as Romanian and individuals from the Roma community, often hard to reach, facing severe marginalisation and discrimination with heightened vulnerabilities. Often originating from rural, marginalised, and socially excluded backgrounds, these groups are reportedly often recruited and lured into exploitation through the lover boy-method. Stakeholders overall reported less violence often used by Romanian traffickers or pimps who rather use increased soft manipulation to keep the victims in exploitation. Bulgarian pimps were mentioned as very violent, on the other hand.

3.1.1.4. Ukraine

Ukrainian women have been a known victim group across the Baltic Sea Region for several decades. The Russian unprovoked war of aggression on Ukraine was widely expected to increase the number of Ukrainian THB victims in the CBSS Member States. Some member states have identified an increase while most have not yet noted a significant increase in THB victims exploited for sexual purposes from Ukraine. National stakeholders in the latter group of states credited the lack of anticipated increase of Ukrainian women to the preventative work carried out quickly after the Russian unprovoked war of aggression began and as the region widely welcomed Ukrainian refugees with information, social benefits, and accommodation – as well as the EU mass protection directive.⁸²

While not officially identified, there remain presumptions and suspicions among the Baltic Sea Region states of an increase of victims from Ukraine, not evident

81 Polismyndigheten, Nationella operativa avdelningen, "Varför tog ni just oss? Alla håller ju på med det!" Slutrapport från Projekt Människohandel!, 2023

82 European Union, Council Directive 2001/55/EC, 20 July 2001

through official statistics. Stakeholders in contact with presumed victims of THB reported that Ukrainian victims and women engaged in prostitution commonly migrate between Ukraine and the CBSS Member States with a general unwillingness to be officially identified, report crimes committed against them or receive support from state or NGO actors. The economic marginalisation due to the war has increased the vulnerability of this group, with stakeholders reporting that Ukrainians engaged in prostitution or who are victims of THB are convinced that selling sex is the only way for them to provide for themselves and their families. There are also signs of advanced ways of controlling these victims, with a high degree of mobility and constant transiting of these victims across the Baltic Sea Region, complicating victim support and identification.

Following the start of Russia's unprovoked war of aggression, stakeholders noted that there has been a decrease of identified or presumed victims of THB for the purpose of sexual exploitation from Russia. This was largely attributed to the complicated movement between the CBSS Member States and Russia. While not widely reported, there were indications during the information-gathering process that Russian victims persist in the CBSS Member States, but often identify as Ukrainians in contact with state agencies or victim support NGOs due to the increased stigma connected to their identity. This was reported to also increase the vulnerability of this group in the region, pushing this group further into dark spaces of THB and prostitution, with less perceived protection available.

3.1.2. Changes – new victim groups and dynamics

While there has been general stability in terms of victims identified, with known groups still being represented in statistics across the CBSS Member States, there have been significant changes in terms of victim groups identified. Victim groups are previously largely unknown and new ways of exploiting these individuals have been evident, in particular, related to victims from South and Central American states (Latin America) as well as an increase of citizens of the CBSS Member States being sexually exploited in their country of origin.

3.1.2.1. Latin America

Across the CBSS Member States, there has been an evident and significant increase of THB victims exploited for sexual purposes originating from Latin America. Colombia and Venezuela were the most reported countries of origin across the Baltic Sea Region while victims were also commonly reported to come from the Dominican Republic, Cuba, Paraguay, Uruguay, El Salvador Nicaragua, and Brazil. Victims from Latin America were reportedly often transited through Spain and Italy to a lesser extent. However, some states also reported new trends where victims from this region are transited straight to the CBSS Member States following more generous visa agreements with the countries of origin and countries of destination. While the victims have entered the Schengen zone carrying official documents with visa stamps, it has been reported that they entered the Baltic Sea Region without their passports or other official documents.

Overall, stakeholders reported that women identifying as both heterosexual and LGBTQIA+ as well as trans persons are prevalent victim groups in the Baltic Sea Region. Actors reported that trans persons engaged in selling sexual services or exploited for sexual purposes through THB do so to pay for gender-affirming care that takes a long time and is expensive for this group. It was reported throughout the information gathering that the Latin American victims often come from economically marginalised contexts with limited education throughout their childhoods. The exploitation is reported to occur either in their countries of origin

or upon arrival to Europe, where Spain is most commonly the first transit state for these victims. In these cases, the victims arrive in Europe hoping to find work but are manipulated or forced into prostitution or exploitative circumstances resulting in THB. However, Latin American victims are reportedly a group that is hard to reach for outreach actors, complicating the information gathering and understanding of the situation of this victim group.

Law enforcement throughout the CBSS Member States reported that Latin American victims are often reluctant to report to the Police, to be identified as victims and thus to receive support. Similar to the Romanian victim group, Latin American victims were reportedly sometimes pushed towards victim or prostitution support actors to access medical care due to severe health issues, but despite this, there is a reluctance to report or be identified as a victim. These individuals reportedly rarely aim to stay in the country where they are identified and change places often as their traffickers control them from the state where the exploitation started, often in their countries of origin.

3.1.2.2. Domestic victims and perpetrators

Over the past decades, a significant number of victims exploited through THB for sexual exploitation in the Baltic Sea Region have originated from countries within the region. From a regional perspective, this indicates that victims were often transported from one country to another within the region. While cross-border THB remains prevalent, there has been a noticeable trend towards what is referred to as domestic THB. In this context, victims are exploited within their own country of citizenship, meaning no international borders are crossed for the exploitation to occur. Although no data was presented to support this claim, an increase of domestic THB has been observed and was reported by stakeholders in most CBSS Member States.

While migrant and third-country victims are often seen to come from economically marginalised backgrounds, the situation for domestic victims differs, as reported by stakeholders in contact with this THB victim group. Coming from various socio-economic backgrounds, common marginalisation factors attached to this group were reportedly debt accumulation and a worsened economic situation for the household, substance abuse, and addiction, exploitation in partner relationships, or 'meeting the wrong people'. It was noted by some stakeholders that domestic victims identified in general came from a greater variety of backgrounds where marginalisation was not necessarily central to their vulnerability.

Drawing on similarities to domestic violence, stakeholders reported that it is hard for women who are sexually exploited through partner relations to break free from their exploitation, or to admit they are being exploited. This is often due to a prolonged normalisation and manipulation process. While often sentenced for procuring or pimping, these cases have clear indications of THB-like conditions as sentences for procuring or pimping are common.

While agreed that states are catching up to this trend shift, stakeholders acknowledged that THB is often seen as an issue related to migration and that this narrow understanding of the phenomenon is a barrier to identifying more victims of THB among citizens of the region.

3.1.2.3. Chinese victims

Victims of THB for the purpose of sexual exploitation originating from China were reported as another clear trend shift among the member states. This victim group was reportedly first identified at the end of 2021 but has increased in identification and suspicions since. A common trend among this victim group is reported that they are exploited for multiple purposes and often transited to

the Baltic Sea Region through either the Netherlands or Belgium. Law enforcement stakeholders also overall reported that this is a group that is very hard to reach with information or to offer support services. Some reported that if detected, the traffickers transit the victims rapidly to avoid further contact with law enforcement.

3.1.2.4. Recently identified victim groups

While Nigerian women have long been identified as a victim group in the Baltic Sea Region, stakeholders reported THB victims from other African states. Uganda, Ethiopia, Kenya, Ghana, Benin, Guinea, DR Congo, and Cameroon were all mentioned during the information gathering. Uganda and Kenya were examples provided by stakeholders as countries of origin of THB victims identifying as LGBTQIA+, fleeing legislation repressing their sexuality by death penalties. Swedish state actors reported that in recent years, victims of DR Congo have been noted across the state. This group often enters both the Schengen zone and Sweden without any VISA stamps or official documents, amid suspicions of human smuggling.

Suspected THB victims from non-traditional countries of origin such as various Middle Eastern states have been reported through a mix of forced marriage and sexual exploitation among member states. Forced marriages are reportedly sometimes arranged by the victim's family following suspicions that the victim identifies as LGBTQIA+. Stakeholders active in victim identification and protection around the Polish borders to Belarus reported that suspected victims from Yemen, Somalia, Afghanistan, and South Sudan enter the Schengen area to apply for asylum. While not confirmed, actors suspect that these individuals are often sexually exploited on their way to the Baltic Sea Region.

3.1.3. Marginalisation and Vulnerabilities

As highlighted, victims of THB for the purpose of sexual exploitation come from various socio-economic backgrounds and are differently vulnerable to the risks they face. This part of the overview will shed light on the differences and similarities between citizens of the CBSS Member States and migrant victims of THB.

The socio-economic background can impact the vulnerability of victims, both nationals and migrants, exploited for sexual purposes in the Baltic Sea Region. Some stakeholders stated that economic hardship and economic inequality are the main drivers of the vulnerability of THB victims globally. Migrant victims are often mentioned to come from 'poor' backgrounds where lack of employment opportunities coupled with political turmoil and lack of protection increase their vulnerability to traffickers' recruitment. Debt was also mentioned as a way for traffickers to exploit victims, as loan sharks have been mentioned to either sell the debt of women to traffickers or to act as traffickers themselves. Similarly, debt and economic hardship were mentioned among the reasons for citizens of CBSS Member States to end up in either prostitution or as victims of THB.

Stakeholders commonly reported that cognitive disabilities as well as trauma increase the vulnerability of women to being lured by human traffickers and being exploited for sexual purposes. Victim support actors across the region reported that presumed or identified victims of THB often carry some sort of intellectual disability or suffer from pre-lived trauma, oftentimes stemming from sexual abuse. This has increased significantly due to the increase in the use of the Internet and social media platforms as the first point of contact between perpetrators and victims. An example of a platform used for sexual exploitation is OnlyFans, as some states reported that partner-related exploitation through

the platform has increased.

Fetishisation and exoticification of victims is another key driver of vulnerability reported by stakeholders. Through this and the demand it contributes to increasing, human traffickers and buyers actively look for vulnerable individuals to exploit for their gain. This was reported as an issue for women and LGBTQIA+ persons from Africa and Latin America. Victim support agencies reported specific trends where perpetrators aim to supply specific demands in the CBSS Member States of very young or child-looking women to be exploited. This was specifically mentioned about victims of THB from Latin America. Severe fetishisation was also reported about LGBTQIA+ persons in the region, for transwomen. Through marginalised positions in society (youth, children, LGBTQIA+) coupled with economic hardship, these groups are increasingly vulnerable, both in their countries of origin and destination. LGBTQIA+ individuals also reportedly face severe levels of violence in relation to their sexual exploitation, both from traffickers and buyers.

3.2. PERPETRATORS

THB is often organised through criminal networks, and perpetrators have traditionally been men. These dynamics are part of current trends in the field, with some changes evident through conversations with key stakeholders.

Both state and NGO actors reported that criminal networks are common in the organising of THB across the Baltic Sea Region. Networks situated in Latin America, Hungary, the Czech Republic, Romania, and Bulgaria, were all mentioned, as Swedish stakeholders referenced recent studies stating that women are increasingly used as part of payments in criminal network settings nationally. Stakeholders reported that recent trends in the region indicate that networks organising THB can be more flexible and loosely coordinated, with sometimes fewer persons involved in the organisation without any clear hierarchy, which has previously been common in identified networks. As part of this, traffickers often utilise a 'business model'. This model often ensures a greater share of the profits of exploitation between perpetrator and victim. While it is still very common for traffickers to use excessive violence and physical force towards victims to keep them in control, stakeholders reported that increased soft control and manipulation are part of the recent model. Extorting victims through soft control tools such as social and cultural shame ensures that perpetrators can keep victims in exploitation without the use of violence at the same levels as historically. Through this, perpetrators can control and keep track of victims from a distance, thus also minimising the risk of detection from law enforcement authorities in the CBSS Member States.

Key vulnerability factors related to the soft control methods mentioned are the common practice of both sugar dating and the lover boy-method used by perpetrators. Sugar dating as a phenomenon has been common in the region for a period and is reportedly still increasing in commonality. This exploitation increases the vulnerability of the person selling services, with reports stating that exploitation victims of THB often is initiated through sugar dating where photos and videos can be used to extort victims to continue selling sexual services, or even be forced to provide them for free. Similarly, the lover boy-method, when a man actively engages in a fake relationship with one or several women to traffic them, has been common in the Baltic Sea Region for a long time. With the relationship as a clear strategy of control, the method is often utilised by organised criminal networks to exploit vulnerable individuals for sexual purposes. Similar to sugar dating, anyone can become a victim through the lover boy-method, non-dependent on background. However, it was widely reported by stakeholders that this is a method commonly used against individuals with cognitive disabilities, luring them into THB for the purpose of sexual exploitation. The usage of social media has contributed to enabling contact with vulnerable persons and shortening the time for traffickers to force victims into sexual exploitation. Notably, stakeholders argued a need for widening the understanding of the lover boy-method as this method reportedly is often used by girls or women to exploit women or boys.

There is a need to widen the perspective of THB and who the perpetrator can be or is. As stated, men are predominantly the perpetrators and have been so traditionally. Women are increasingly noted as traffickers, and while this signals a trend shift to some degree, men remain the most common perpetrator group. Female perpetrators are reported to be either old victims themselves, moving up the hierarchy within networks, or not, as reported throughout the information-gathering activities. Ukrainian women were mentioned as a perpetrator nationality exploiting Ukrainian victims, while Nigerian women as traffickers

had been mentioned among victims from Nigeria, Benin, or Guinea, indicating a more international exploitation operation in West African states.

Stakeholders across the CBSS Member States reported challenges in locating and sentencing the main perpetrators and organisers of THB for the purpose of sexual exploitation. Reasons for this are the new operation models of perpetrators mentioned, as well as a change in arenas. The challenges have pushed law enforcement authorities across the region to increase their efforts or 'follow the money' to better sentence perpetrators. Efforts are often complicated by the increased use of cryptocurrency with less traceability than regular currency. Law enforcement authorities also reportedly face challenges in retrieving the money from perpetrators, putting greater responsibility on state compensation to victims identified.

3.3. ARENAS

Dynamics had begun to change from street and brothel prostitution and exploitation to the internet and short-term flats before 2020 but the restrictions that followed the COVID-19 pandemic accelerated this trend. Victims are now increasingly exploited through online forums or have their ‘services’ advertised online to be exploited in pre-leased flats or apartment hotels. Thus, sexual exploitation has moved from largely public places to more hidden spaces. OSCE reported that this reduced the visibility of the buyer and user behaviour and increased the “efficiency of interactions” between the selling and buying part.⁸³ Stakeholders reported that another key aspect of this change in arenas is that perpetrators are reportedly ensuring that victims change locations irregularly, ensuring the limited risk of having their crime detected. These dynamics have complicated outreach work for victim support actors and the possibilities of law enforcement authorities to control or raid arenas where victims of THB might be exploited. This has resulted in higher barriers for victim identification and criminal investigations across the CBSS Member States.

As barriers for victim identification or outreach work have become higher, the threshold for exploiting children sexually is perceived as lower. Through this change in arenas, there is less risk to be detected for traffickers exploiting children, a worrying development among key outreach stakeholders. The current form of arenas can rapidly change too, putting excessive pressure on authorities to keep up to both prevent and detect sexual exploitation online and in short-term flats.

Another important aspect noted in meetings with key stakeholders has been the increased usage of arenas where buyers of sexual services can rate their experiences with women in prostitution and victims of THB for the purpose of sexual exploitation. Through such forums, the threshold to purchase sex from THB victims is lowered due to a normalisation process of the act. Buyers of sexual services have previously had to go to places with certain stigmas connected to them, brothels or specific streets in cities. The change in arenas and increased accessibility of sexual services online have thus meant that there is limited need for this. Here, the aspect of rating and recommending services among buyers contributes to the process of making this into a normal market, nurturing and increasing the demand for such services.

83 OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, ‘Discouraging the demand that fosters trafficking for the purpose of sexual exploitation’, 2021

4

PREVENTION AND VICTIM PROTECTION

In conversations with key stakeholders across the CBSS Member States, victim identification and prevention efforts were central. Stakeholders overall acknowledged that the current dynamics and trends of THB make victim identification challenging and that increased efforts are needed. This section aims to highlight some key aspects of the challenges mentioned and what stakeholders see as needed to improve their work to identify THB victims.

4.1. PROACTIVITY

Stakeholders often mentioned proactivity as a key component to effective victim protection and prevention work, noting that this is also often lacking. Possibilities of proactiveness among law enforcement agencies in anti-trafficking efforts are tied to available resources and internal structure. A good example of handling a general lack of resources is the establishment of specialised Police units active in outreach work, victim identification, and prevention. Building up a solid reputation of working in the interest of victims, these specialised units can be very effective in their efforts to protect victims and prevent THB. However, proactivity is often a challenge as resources are not always available outside of these units. This contributes to complicating collaboration between state actors and NGOs. Law enforcement authorities reported that reactivity can be an issue in early identification and trust building towards the whole THB system nationally. Working towards implementing task forces, where state and NGOs work closely together, or specialised Police THB units can thus bridge a gap and assist in trust building and ensuring a proactive approach.

Good practices in proactive actions centred on collaboration between state agencies and NGOs or the private sector. Using passenger lists for flights, ferries, trains, or other means of transport has been a successful effort for early identification of victims. Such efforts combined with targeted trainings for airline personnel on THB indicators have proven successful in several states in the Baltic Sea Region. Webscraping and analysing content uploaded on online sexual advertisement sites was mentioned as an emerging good practice in this field, with more resources needed to increase effectiveness. Such initiatives can come in collaboration between the state and NGOs, as well as private internet providers.

Enhanced proactiveness among key actors is needed and stakeholders called for authorities in the THB field to create platforms of information sharing between states to ensure this. Concretely, the issue of creating partnerships between state agencies and NGOs was raised, rather than viewing NGOs as service providers to turn to on an ad-hoc basis. Creating national networks which could share and discuss strategic issues, and which consist of both state agencies and NGOs, was highlighted as both needed in some states and as a good practice in others.

Such initiatives could fill coordination and information-sharing gaps both nationally and internationally. Establishing spaces for information sharing and collaboration among professionals both internally and between CBSS member state stakeholders could be a way forward, to ensure regular updates on

emerging trends and developments in the Baltic Sea Region and proactiveness in future initiatives.

Proactive actions on updating legislation to tackle THB are important, but there are often challenges in ensuring that legislation is implemented effectively or followed. There was a perception among stakeholders that states sometimes strive to be 'best in theory' when it comes to efforts on THB, while there is a perceived less focus on being 'best in practice'. More efforts and discussions between stakeholders are encouraged to ensure close collaboration and become more effective in the groundwork to implement and ensure that legislation is followed as intended by legislators.

4.2. NEED FOR A VICTIM-CENTRED APPROACH

A victim-centred approach and how states can increase this was debated throughout the information gathering for this report. State and NGO actors agreed on the need to ensure victim support but acknowledged the challenges in doing so.

Pre-trial investigations for THB cases often take at least two years to conclude due to the complex nature of the crime. The length is widely understood as a complicating factor to ensure victim protection and effective access to rights and remedies. A main reason reported was that income levels among victims significantly drop as their exploitation stops, resulting in challenges to provide for themselves and their families. The mentioned business model utilised by perpetrators, as reported earlier, provides further obstacles in these instances, along with the severe manipulation contributing to the fear of authorities and distrust in the process.

A high proof burden is understood to heavily contribute to the lengthy pre-trial investigations. Stakeholders argued that the proof burden on victims of THB for the purpose of sexual exploitation is too high and that the amount of proof needed to sentence a perpetrator THB is too high. Police authorities and prosecutors need to gather a lot of evidence (documents, photos, videos, conversations) to prosecute or sentence perpetrators, while witnesses are often central to sentence perpetrators. Accessing the documents needed and convincing witnesses to testify is challenging as THB for the purpose of sexual exploitation is perceived as rarely documented with high pressure of witnesses since THB is often tied to organised criminal networks. The complications and challenges faced by law enforcement authorities often result in traffickers being sentenced for less severe crimes, if sentenced at all, such as pimping or procuring, where the burden of proof is understood to be lower. This also often means that victims cannot access the rights and remedies they would have been entitled to if the criminal processes were for THB. Stakeholders thus stressed the need for lower proof burdens to sentence a human trafficker, with discussions ongoing in member states on how this could be accommodated.

5

ACCESS TO RIGHTS AND REMEDIES

As ratifiers of the CoE Trafficking Convention, all CBSS Member States have made relevant rights and remedies available to victims of THB through various systems, either operated fully by the state or in collaboration and support from expert NGOs. During discussions with key stakeholders, the focus has been on understanding how they ensure effective access to the rights and remedies victims of THB are entitled to. Below common challenges to ensuring effective access will be discussed, as will good practices.

5.1. SYSTEM COORDINATION: FRAGMENTED AND COMPLICATED

Ensure effective access to rights and remedies for victims of THB is one of the main challenges in the CBSS Member States as fragmented or complicated systems were mentioned as central issues. Stakeholders generally stated that insufficient coordination of victim support and protection efforts contributed to the sense of a fragmented system. National Referral Mechanisms (NRM) were mentioned as needed progress to ensure better conformity and collaboration among actors while also reporting insufficient coordination efforts for the NRM to fulfil its purpose, meaning that the introduction of NRMs is not sufficient if there is no clear ownership, coordination or formalised process in terms of responsibilities and role of each stakeholder intended to support and assist victims. Coordination reportedly is well-functioning at the local or regional level (particularly in large city areas). In contrast, national coordination is complicated because of the perceived fragmented system, too often resulting in a situation where the process of offering assistance is complex and where victims cannot access rights and remedies in practice.

Issues around NGO and state agency collaboration were central to discussions on the accessibility of rights and remedies for victims of THB across the region. National anti-trafficking stakeholders in general acknowledged the importance of NGOs as victim-service providers and in ensuring a low threshold for victims to access support services. However, both NGOs and state actors generally agreed that collaboration needs to be improved to secure better effectiveness in the efforts required to protect victims and ensure accessible rights. Ensuring effective and consistent NRM implementation and coordination are central to this and to clarify ownership in processes of victim support and identification.

As national victim support structures include multiple stakeholders, there are also different roles among actors depending on the victim's identity. The support services available differ greatly depending on if the victim is a national, child, adult, or depending on legal status. Without a coherent system, with clear coordination structures and leadership, challenges will remain to ensure effective access to rights and remedies for victims.

5.2. VICTIM BENEFITS

Among outreach NGOs it was widely reported that they find it challenging to convince victims of THB to be officially identified and thus gain access to certain rights and remedies. The fact that presumed or potential victims in many cases need to be officially identified by state actors is a barrier. It was argued that lowering the threshold for assistance and basing it rather on early indicators of exploitation, rather than a formal identification process which is sometimes even connected to a criminal investigation, would ensure that more victims could get access to assistance and support depending on their individual needs. In general, linking the possibility to receive support with the expectation of cooperating with authorities in a criminal investigation, was concluded by several to be a bad practice.

Convincing migrant victims of the benefits of being identified as a victim of THB is challenging for key stakeholders across the Baltic Sea Region. It is understood that migrant THB victims overall hold limited trust towards state authorities, complicating access to rights and remedies as state actors are central to this service provision. This dynamic puts an emphasis on the outreach work and information provided by stakeholders in contact with victims of THB. Close collaboration between stakeholders is important, as is managing expectations of victims before reporting to authorities about the exploitation experienced. NGOs are reportedly often tasked with this through victim counselling and consultations and what might be required by a victim before reporting. The perceived high proof burden for THB is complicating this and as rights and remedies are different depending on how law enforcement agencies see the exploitation, it is important that victims receive correct information. Peer-to-peer information is central in these situations, where identified victims that have received state support can be effective in convincing victims of reporting the exploitation suffered. However, the current situation is often that migrant victims leave the state where they have been exploited before any criminal proceedings can be initiated. Stakeholders overall noted a difference in these aspects between domestic and migrant victims, as domestic victims reportedly have slightly higher trust in authorities and willingness to be identified as victims.

The lack of flexibility in terms of applying for and granting reflection periods to victims is a major hurdle in the process of victim assistance. All states follow the CoE Trafficking Convention guidelines on the reflection period to grant victims at least 30 days as a reflection period as it is also common among states to give victims the possibility to receive a temporary residence permit during the pre-trial investigations. Moreover, temporary residence permits are often conditioned on aiding the investigations, a practice deemed damaging and increasing the risk of the victim, especially since states often repatriate THB victims once legal procedures are concluded due to the difficulties, or lack of possibilities, to obtain permanent residence permits or asylum on the grounds of human trafficking exploitation. This contributes to a general sense of insecurity among victims as they fear deportation once they encounter state actors.

Complicated procedures putting the rights of the victim second create unsustainable situations - for the victim as well as the stakeholders trying to offer assistance and protection. Having to arrange with high-threshold processes connected to temporary residence permits and formal identification processes before even beginning to design an assistance plan for the victim, is not a procedure that has a victim-centred approach. On the contrary, the needs and rights of the victims end up being a factor dependent not on their rights enshrined in international

and national law, but rather on practical rules connected to migration legislation.

Victim services providers in the region highlighted that lowered thresholds for assisting victims would contribute to a greater chance of rehabilitation and reintegration into society, free from exploitation.

5.3. LOW-THRESHOLD SUPPORT

National anti-trafficking stakeholders and victim-service NGOs alike stressed the importance and good practices of ensuring that victims have low thresholds to services and support during and after their exploitation. Establishing and running a hotline or helpline for victims of THB was generally lauded as a good practice, both among the states that have such services, and among those currently lacking them. A hotline operating all day, every day, ensures that both victims and the public can reach out for support or reporting of crime. The central aspect of the hotlines is to ensure that they operate in multiple languages. This is another aspect that would provide a low threshold for victims in general, as the need to be understood is key in exploitative and traumatic situations. Some stakeholders also reported an overall aim to ensure they recruit staff from similar backgrounds and cultures as the main victim groups in their state. Others reported the value of including rehabilitated victims of THB, survivors, in their outreach work to engage and build trust among victims in their states. These types of efforts can contribute to THB victims' trust in the organisation, eventually leading to a willingness to be identified and access their entitled rights and remedies.

Similarly, ensuring effectiveness and value in the support package can contribute to victims who have accessed the services sharing positive experiences with others. Thus, ensuring that the support provided is consistent and accessible can contribute to change. Especially in combination with meeting places for persons in prostitution and victims of THB open regularly for health check-ups, counselling, or warm food, where victims can meet others in exploitation who have received support and hear about their experiences. However, this could work the other way around and be damaging to the victim support and identification system should the services be insufficient or ineffective.

Restoring or upholding victim agency was also mentioned as central in ensuring low thresholds for victims to access rights and remedies. The previously mentioned general unwillingness to be identified as victims can be impacted by actors branding individuals as victims without the acceptance of the exploited person. This can create a barrier to the actual support and identification of the victim as reported by stakeholders. Victims of THB reportedly have several layers of abuse and trauma to handle before being able to self-identify as a victim of THB and telling them they are victims of THB too fast could result in negative consequences for the victim in their willingness to access rights and remedies available.

5.4. CONFLICTING LEGISLATION – NATIONALLY AND INTERNATIONALLY

Non-THB legislation at the national and international level sometimes complicate victim identification, protection, and access to rights and remedies, with examples provided by stakeholders often involving migration legislation and policy. The legal status of victims is central to accessing rights and remedies. Without the victim of THB having the right to stay in the state of exploitation, there are risks that these individuals are unable to access their rights and remedies. This potential inability is based on the risk of deportation, due to either asylum processes or because of engagement in prostitution complicate victim protection efforts in the CBSS Member States. Potential THB victims are detained at migration centres, away from outreach workers. The lack of THB-specific competence among professionals in such centres complicates the issues, as victims are seen as prostitutes, rather than victims of crime. The fear of deportation, if their activities are known, keeps victims away from authorities, an issue often used by traffickers in their manipulative efforts to keep victims in sexual exploitation. The Dublin Regulation was also mentioned as contributing challenges in identifying refugee and third-country victims. The Dublin II Regulation means that should a refugee THB victim seek asylum in the state they have been exploited, the victim would be transferred to the first state in the EU they entered, with reported results often meaning less protection of their rights.⁸⁴

84 European Union, 'Dublin II Regulation', 2003, last updated 2011

5.5. LONG-TERM FUNDING TO ENSURE EXPERT COVERAGE AND SUSTAINABILITY

State and NGO actors emphasised the need, and difficulties, of ensuring long-term funding and partnerships. Ensuring consistent support from the state to NGOs in victim support work was generally mentioned as a good practice in the region. It generally provides stability, possibility of growth, and competence retention in key positions in NGOs engaged in making rights and remedies accessible to THB victims. In states where funding has decreased or is expected to decrease over the coming years, what is lauded as good practices where stability is achieved, is reported as major worries and challenges to continue the support needed. Due to a generally difficult economic situation in the CBSS Member States, NGO funding is expected to decrease significantly in some states. The expected result among both state and NGO stakeholders is that victim support services, and the services provided by these to ensure effective access to rights and remedies, will diminish, resulting in less effectiveness and reach. With the risk of a service void, there will be a greater responsibility of the welfare states to ensure effectiveness in the public efforts and at least sustained funding to these institutions to continue at the current levels of support. Despite any increase in state efforts, the joint work between state and NGO actors is central as the actors often have access to different groups at different levels or stages of exploitation. Thus, ensuring sustained funding for THB victim support agencies ought to be seen as key.

Key state and NGO actors across the Baltic Sea Region are increasingly worried about the financial situation of their organisations amid decreasing funds to civil society organisations. It was reported in most member states that limited funding or greater state control of the funds received contributes to challenges in ensuring effective victim support. The state and NGOs both hold key roles in ensuring that the welfare of THB victims is protected and upheld, with NGOs generally having better access to the victim group than the state. Thus, sustained and consistent funding is needed for the NGOs active in this field to ensure effectiveness in the work for victims.

5.6. VICTIM-CENTRED COLLABORATION

States emphasised the need to ensure that collaboration between state and NGOs, and between NGOs has a victim focus as its core value. Establishing task forces, or networks for information sharing and actions, building on each other's different competencies, and establishing a general culture of collaboration and non-competitiveness were all mentioned as good practices to be nurtured. Many states mentioned that the generally small size of their THB landscape means that there are short contact ways where actors can be quick in their responses. In the same states, it was sometimes mentioned that a general organisation of efforts and a further improved system are needed.

Collaborating with employers from the private sector was also mentioned as a key effort to ensure that victims can be socially rehabilitated and reintegrated into society. An example of this is to provide victims with low-threshold job opportunities to earn money through non-abusive, non-exploitative circumstances. Such efforts ought to be flexible and done in collaboration between victim support actors and the private sector, with the welfare of the victim at the centre.

6

DEMAND

While all CBSS Member States have ratified international legal frameworks that include provisions to discourage the demand fostering human trafficking, a unified understanding of what constitutes “demand,” how it should be addressed, and why it is essential, is lacking. The commitment of the CBSS Member States, as outlined through international legal frameworks, is to discourage the demand that fosters exploitation that leads to trafficking.⁸⁵

THB for the purpose of sexual exploitation could be seen as a market system, where economic profit generation is the main driving factor. Within this market system, humans through their victimisation are the commodities that are traded with, upheld by the demand for the services provided and ‘complex social networks’.⁸⁶ The market could be seen as fostered and upheld by the “seemingly endless supply of persons ‘available’ for exploitation in the source countries; the endless demand for the services they provide in destination countries; and organised criminal networks which have “taken control of this economic “supply and demand” situation to traffic and exploit trafficked persons in order to generate enormous profits”.⁸⁷ While the idea of discouraging the demand for sexual services provided by persons in prostitution and human trafficking is understood to initially come from an abolitionist standpoint, key stakeholders argue that to end the financial motivations that drive THB for the purpose of sexual exploitation, it is central to reduce demand, as demand that fosters sexual exploitation incentivises the exploitation of adults and children.^{88 89}

This chapter will discuss the legislative frameworks related to demand discouraging the CBSS Member States have all ratified and discuss and highlight key findings from the information-gathering activities of this report.

6.1. DISCOURAGING THE DEMAND – POLICIES AND FRAMEWORK

Discouraging the demand is emphasised through international legal frameworks and policies and is deemed key to preventing THB for the purpose of sexual exploitation. It has been debated during the drafting processes of both the Palermo Protocol and the CoE Trafficking Convention whether international entities ought to work to discourage sexual services provided by prostitutes or

85 OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, ‘Discouraging the demand that fosters trafficking for the purpose of sexual exploitation’, 2021

86 Aronowitz, A. & Koning, A., ‘[Understanding human trafficking as a market system: addressing the demand side of trafficking for sexual exploitation](#)’. *Revue internationale de droit pénal*, Vol. 85(3), 669-696, 2014

87 Bales, K., ‘[Understanding the demand behind human trafficking](#)’, Working Paper, no date

88 OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, ‘Discouraging the demand that fosters trafficking for the purpose of sexual exploitation’, 2021

89 Planitzer, J., ‘Article 6: Measures to discourage the demand’ in ‘A commentary on the Council of Europe Convention on Action Against Trafficking in Human Beings’, Edward Elgar Publishing, 2020

sex workers or to simply clearly distinguish between trafficking and sex work.⁹⁰ At the final stage of the drafting of the Palermo Protocol, member states agreed to include a paragraph on discouraging demand that fosters “all forms of exploitation of persons, especially women and children, that leads to trafficking”. The measures mentioned in Article 9 (5) in the Protocol include educational, social, and cultural measures through bilateral and multilateral cooperation.⁹¹ While the Palermo Protocol does not provide any direct reference to sexual exploitation, the mention of women and children, who most commonly are exploited for sexual purposes, should be read as a reference to this THB exploitation form. Article 6 of the CoE Trafficking Convention, Measures to Discourage the Demand, builds on four pillars that states are bound to implement nationally to discourage demand. The measures states are bound to implement are:

- a) research on best practices, methods, and strategies;
- b) raising awareness of the responsibility and important role of media and civil society in identifying the demand as one of the root causes of trafficking in human beings;
- c) target information campaigns involving, as appropriate, inter alia, public authorities and policymakers;
- d) preventive measures, including educational programmes for boys and girls during their schooling, which stress the unacceptable nature of discrimination based on sex, and its disastrous consequences, the importance of gender equality, and the dignity and integrity of every human being.

Thus, Article 6 of the CoE Trafficking Convention builds on the Palermo Protocol Article 9 (5). It is considered that the structure of the obligations formulated through the CoE Trafficking Convention provides more ways to interpret the term ‘demand’ for states, and sets a higher threshold compared to the Palermo Protocol of what states ought to do for demand to be discouraged.⁹²

CBSS Member States have through ratifying the mentioned international legal frameworks committed to discouraging the demand for sexual exploitation through THB. Legislative initiatives differ across the member states as does the analysis of what is needed to discourage the demand, and if discouraging the demand is the main preventative initiative needed to tackle THB for the purpose of sexual exploitation.

6.1.1. Initiatives and strategies to discourage demand – beyond legislation

During the information-gathering for this report, stakeholders across the member states differed in their understanding and perception of the importance of discouraging demand, as defined through international legal frameworks. This differed not only between states, but also within states depending on organisation, authority, focus, mandate, and roles. For some national stakeholders, the regulation of prostitution—particularly the prohibition of purchasing sexual services—is regarded as a cornerstone in efforts to counter demand. These stakeholders see such measures as instrumental in combatting human trafficking for the purpose of sexual exploitation. However, others advocate for a broader

90 Planitzer, J., ‘Article 6: Measures to discourage the demand’ in ‘A commentary on the Council of Europe Convention on Action Against Trafficking in Human Beings’, Edward Elgar Publishing, 2020

91 Palermo Protocol

92 Planitzer, J., ‘Article 6: Measures to discourage the demand’ in ‘A commentary on the Council of Europe Convention on Action Against Trafficking in Human Beings’, Edward Elgar Publishing, 2020

range of preventive measures, suggesting that solely targeting the purchase of sexual services legally may not adequately address the underlying issues. Meanwhile, a third group of stakeholders downplays the priority of addressing demand altogether, viewing other interventions as more effective for countering trafficking and protecting victims.

The diversity in approaches also stems from substantial differences in the perceptions of prostitution itself. For some stakeholders, human trafficking and prostitution are closely interlinked phenomena, making it necessary to tackle both simultaneously through demand-reducing strategies. Others, however, draw clear distinctions between the two, arguing that efforts to reduce demand should focus specifically on human trafficking rather than addressing prostitution more broadly.

The following section aims to show the different perspectives and highlight the needs beyond legislation to discourage or reduce demand.

6.1.2. Lack of unified understanding

It was evident throughout the information-gathering activities for this report that there is a general lack of commonly shared perceptions on what demand-discouraging initiatives constitute and how stakeholders could work to discourage demand. The lack of unity does not necessarily stem from legislative disagreements among stakeholders since most national stakeholders agreed with the legislation and provisions in place in their country, but rather from a lack of common understanding of what efforts are needed beyond legislation. Some NGOs argued to establish a Nordic Model in the states currently not following this model. In other states, key stakeholders overall argued that discouraging demand is not where the focus should lay. Rather, issues around consent to be at the centre of prevention initiatives were underscored among these stakeholders, as an effective strategy of preventing exploitation. Some stakeholders in states where purchasing sexual services is unregulated or legal acknowledged that it is complicated to divide the demand for THB for the purpose of sexual exploitation and prostitution due to how closely connected, they are. Others argued that separating the two is central to any demand-discouraging discussion, as they perceived there is no demand for victims of THB for the purpose of sexual exploitation, but only for services provided by non-victims. Demand is often seen as a politically loaded issue due to the strong connections to specific legislative models.

Educational efforts or public awareness-raising campaigns were often mentioned as efforts to discourage demand, as has been reported elsewhere.⁹³ By aiming to create a collective knowledge and having the public become aware of THB and how damaging it can be to societies and individuals alike, stakeholders argued this as an effective effort to discourage demand. Limited information was gathered, however, on how public awareness of THB would discourage the demand to purchase sexual services from potential victims of THB, as prostitution is not viewed as a practice needed to be prohibited in several Baltic Sea Region states. Furthermore, multiple stakeholders across the member states also called for increased efforts and funds to be allocated to evaluate information and awareness campaigns to ensure that the effects of such initiatives can be better understood, especially in terms of discouraging demand.

93 OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, 'Discouraging the demand that fosters trafficking for the purpose of sexual exploitation', 2021

6.1.3. Knowing use – good practice and ineffective?

Discussing state efforts to discourage the demand, criminalising the known use was mentioned as either a good practice or as an ineffective or insufficient instrument to discourage the demand. Some states have over the past years established a knowing use provision in national THB legislation to ensure alignment with the amended EU Anti-Trafficking Directive. The amended Directive criminalised the “use of a service provided by a victim of trafficking in human beings when the user of the service knows that the person providing the service is a victim”. The amended EU Anti-Trafficking Directive clarified that the “notion of ‘knowledge’ should be interpreted by national law”.⁹⁴

Among those positive to the knowing use provision, there was a belief that this legislation would contribute to discouraging demand in the state by highlighting that purchasing sexual services *can be* illegal. Some NGOs argued that potential buyers get discouraged from purchasing sexual services and that in some cases the knowing use, within a national system where prostitution is unregulated or legal, can jeopardise the safety of prostitutes. To ensure effective implementation of the provision, it was widely argued that it is vital to evaluate the provision in practice to understand its value and discouraging effects. Especially as states overall have reportedly identified very few cases, if any at all, where the buyer has been sentenced based on the known use of the services of a victim of THB.

Stakeholders opposing the knowing use branded the provision as toothless or irrelevant, stating that other legislative instruments would serve a more effective purpose. One NGO in a state where a similar provision is included argued that buyers seek to understand how to identify an ‘ethical’ sex purchase, where the person selling the sexual service is not a victim of THB. An aspect widely reported as impossible to identify. Law enforcement overall reportedly faces challenges proving that buyers have used victims of THB for sexual purposes knowingly, it was argued that it would be more effective to investigate extended interpretations of rape legislation to sentence the group. Furthermore, the knowing use provision reportedly would have a limited effect on CBSS Member States with the Nordic Model, since all purchases of sexual services are prohibited. Despite this legislation, however, the demand persists as key stakeholders in these states argued for increased initiatives beyond legislation to tackle the demand and that more effective implementation of the legislation is required to achieve its purpose. Increased outreach and rehabilitation efforts for men buying or at risk of doing so were mentioned as efforts needed.

94 European Parliament, ‘[European Parliament legislative resolution of 23 April 2024 on the proposal for a directive of the European Parliament and of the Council amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims](#)’, EU, 2024

6.2. UNDERSTANDING AND REHABILITATING THOSE IN DEMAND

Stakeholders engaged in rehabilitation or counselling for buyers, or potential buyers, of sexual services in the Baltic Sea Region reported that understanding the demand is important but also the underlying power structures to sex purchase. On this, it was reported that for the buyers, it can be both the power to be able to purchase sex, but also that some buyers have a sense of powerlessness, that purchasing sex is the only possible way to have sex. Nonetheless, the objectification of the selling part is central.

As there is currently no updated data on how common it is for men to purchase sex in the Baltic Sea Region, stakeholders interested have limited information to understand this group. The general understanding of 'the buyer' across the CBSS Member States is that they are male adults or male youth. Men purchase sexual services from both men, women, and trans persons, if the victim is heterosexual or identifying as LGBTQIA+. Swedish stakeholders reported that buyers of sexual services have become younger over the past years, with minors now commonly reported as prostitute users. Overall, stakeholders working with buyers reported difficulties in understanding the demand as talking about it, even in rehabilitating circumstances, is very stigmatised and filled with shame among buyers caught. Furthermore, stakeholders reported perceptions that buyers do not necessarily see themselves as perpetrators, despite the legislation. An explanation for this was reported that by buying sexual services in certain arenas, such as online or at Thai massage parlours, the sexual service might not include physical or penetrative sex, thus not seen as 'sex'. Furthermore, stakeholders reported challenges to fully understand or identify the buyers. Statistics or other information remain widely limited, non-dependent on crimes related to the purchase of sexual services under the Nordic Model legislative model or the knowing use. The new arenas where the visibility of the sex purchase is more limited risk increasing the occurrence while decreasing the possibilities of actors to identify the act.

7 YOUTH

'Youth' refers to persons aged 15-24 years, encompassing both minors and adults. THB victims have in most cases either first been exploited as minors, or as young adults under the age of 25, with the exploitation continuing through their late teens or in early adulthood, as reported by most stakeholders for this report. Thus, a sub-category of this age group is the main victim group. As such, it is vital to approach this group through intersectionality since youth is not a homogenous group. Youth victims of THB are often migrants or persons with migrant backgrounds, some identify as LGBTQIA+, or come from various socio-economic or cultural backgrounds, and some carry trauma or have cognitive disabilities. Tendencies reported in the member states also include that since THB in general is seen as a cross-border crime, domestic youth victims are sometimes overlooked and remain unidentified. Thus, intersectionality is key to understanding the vulnerability of the victim and the needs of the person.

7.1. VULNERABILITIES

Stakeholders across the CBSS Member States reported trends where youth risk-taking behaviour has increased over the past decade, a trend reported across our member states and globally through overviews and reports.^{95 96 97} Stakeholders interviewed for this report stated that the general demand for *quick cash* has resulted in an increased vulnerability due to a lack of risk assessment related to what could happen should one send sexual content to either known or unknown persons online. However, it is widely acknowledged that the main vulnerability factor in this context is other adults taking advantage of and exploiting these young persons in exchange for money or goods.

The Internet was widely described as a risk environment for youth and adults alike. Stakeholders in some states reported that sexual services are advertised and can be bought on formal online marketplaces in exchange for cash or other means of payment. Social media apps have been mentioned as particular risk environments, where it is easy to both send and save content the sender intended not to be saved. Coupled with the change in arenas over the past years, this has lowered the threshold for exploitation or extortion especially seen among youth and minors.

Digital illiteracy and understanding risks are mentioned regarding Romanian youth exploited through webcam websites where they are exploited live for anyone across the world to see. As one of the main THB countries of origin identified in the Baltic Sea Region, stakeholders reported increased efforts to work with Romanian stakeholders to prevent what is described as a trend 'spreading like wildfire' from becoming further normalised. Coupled with the

95 Quayle, E., Jonsson, L., Löf, L., 'Online behaviour related to child sexual abuse – Interviews with affected young people', Council of the Baltic Sea States, 2012

96 Dalen Espseth, L., 'Hva er jeg verdt? – Unges erfaring med salg og bytte av seksuelle tjenester', ProSentret, 2023

97 Thell, M. & Lind Vasquez, F., "'Man ser det som ett hack. Något lätt som ingen behöver få veta" – en rapport om barns upplevelser och erfarenheter av dugardejting', ECPAT Sweden, 2024

demand for quick cash among youth and minors, social media is mentioned as a key risk environment, as youth are particularly targeted for grooming and are reported to be 'bombarded' with requests to share sexual content for cash or goods. What initially could be sending pictures, reportedly sometimes end up as physical encounters between the victim and the perpetrator, where the victim is forced to perform sexual services or is exploited when a minor, under threat of sharing the content previously shared. Thus, using social and cultural shame as tools for continued exploitation.

When discussing youth as victims, it is important to note that boys as another vulnerable group were mentioned in several discussions during the information gathering for this report. Boys were reportedly often targeted through gaming where other men offered cash or other benefits for sexual content.

7.1.1. Youth as perpetrators

While THB victims are often youth, at least at the start of their exploitation, youth as the perpetrators were also reported. Stakeholders widely reported that youth exploits youth, either through initiating THB for the purpose of sexual exploitation on online platforms or carrying out the exploitation in such spaces. In some member states, stakeholders made the connection to porn and the lack of understanding of the consequences or actions of exploiting another person sexually due to the exploitative nature of porn. Youth and minors are reportedly introduced to porn at younger ages today than before, as stakeholders reported that children around the age of 12 oftentimes are introduced to porn, numbing the children and youth to its damaging effects on behaviours. The extensive use of porn among youth and minors, as reported by some stakeholders in the member states, is thus perceived as a damaging factor increasing youth vulnerability two-fold, among those who end up as perpetrators and victims.

7.1.2. Youth targeted for change and prevention

Preventative actions to decrease the current and future prevalence of THB for the purpose of sexual exploitation were reported to predominantly target youth across the Baltic Sea Region. Some member states have targeted the national school system to include education on online sexual violence, the lover boy-method, or sexual abuse in the school curricula. Others reported visits to school environments to discuss with both students and parents about sexual exploitation and pornography as well as sexual boundaries or risks with the online spaces common among youth. Similar approaches were broadly discussed as key initiatives aimed at controlling the narrative and ensuring that the wider society understands THB and the risks attached.

Importantly, and as reported by stakeholders during discussions for this report, young men or boys might sometimes be excluded from prevention measures targeting school environments. In targeted preventive measures and awareness-raising efforts reported in the region, these have been developed with an evident focus on women and girls as the victims, explained by the fact that this group is disproportionately exploited in THB for sexual exploitation and related crimes. Stakeholders reported the importance of ensuring these campaigns include all youth or children to achieve 'herd immunity' to THB for the purpose of sexual exploitation.

7.1.3. Rights and remedies

Stakeholders were unanimous that low threshold support services are key to ensuring effective access to rights and remedies for youth victims of THB. However, high thresholds remain an issue across the region. This section aims to contribute to an understanding of the accessibility of available rights and remedies for victims of THB as discussed and explained by key stakeholders across the CBSS Member States.

7.1.3.1. Good practices and challenges

Stakeholders across the region continuously mentioned the establishment and implementation of the Barnahus model to ensure effective access to rights and remedies and low threshold support for victims of THB under 18 years of age. As children can receive safe housing, mental and physical health care, attend Police appointments, or access legal support in one place, this is lauded as a good practice. Ensuring that the Barnahus model is protected under national law to provide vital services to minors has been mentioned as key.

There is an acknowledgment that the system to support child victims of THB is generally more robust and cohesive than the system designed for adults in the region. As such, when a victim goes from under 18 to over 18, thus from a child to an adult, the support services available change as they are no longer eligible for the same support received. This provides presumed and identified THB victims with significant barriers to accessing key support services, especially since the proactivity in the support system across the region has been noted as inconsistent or insufficient. Thus, while being a 'youth', there are significant differences in the group in terms of the accessibility of rights and remedies that could need to be amended to ensure better coverage.

Other good practices mentioned across the region are to limit the instances where minors or youth need to testify, either during pre-trial investigations or in court. It is widely perceived among stakeholders that it is traumatising or re-traumatising for victims of THB to testify to their exploitation. Thus, some states in the Baltic Sea Region have ensured that victims can testify on video during pre-trial investigations that can later be used in court, minimising the testifying opportunities. Similarly, another good practice mentioned is that youth only need to testify in court once but without the presence of prosecutors, perpetrators, or audience, but only with the legal aid or lawyer and the court judge. Reported as good examples, stakeholders also stated that there needs to be flexibility in the system for victims to testify, especially as the trauma from the sexual exploitation experienced could hinder victims from initially depicting the truth, and that time could often be needed for THB victims to provide a full statement to law enforcement authorities.

As previously noted, shame is often a powerful and damaging effect of sexual exploitation, providing a barrier for youth and minors to provide a full understanding of their exploitation to competent authorities and organisations. It has been mentioned in connection to youth victims of THB to either report the crimes in the first place, or to fulfil the pre-trial investigations. Shame combined with fear of social or cultural exclusion is reportedly suspected to ensure that THB for the purpose of sexual exploitation against youth and minors remains hidden across the Baltic Sea Region.

8

LGBTQIA+

Victims of THB identifying as LGBTQIA+ have at different points been identified to various degrees in most CBSS Member States. This chapter will highlight issues connected to this fact and discuss challenges and solutions to increase the knowledge about it.

8.1. LGBTQIA+ VICTIMS: VULNERABLE AND OVERLOOKED

LGBTQIA+ THB victims identified in the CBSS Member States are often migrants coming from a variety of places. These include states with repressive LGBTQIA+ laws (Uganda, Tanzania, Kenya) and contexts in which identifying as and being openly LGBTQIA+ carries a significant social and cultural stigmatisation. These groups reportedly have different reasons for migrating to the EU and the Baltic Sea Region. LGBTQIA+ THB victims from repressive states or where it is culturally or socially prohibited are observed to migrate for asylum reasons due to fear for their safety and lives. Some victims in these groups were also reportedly forcibly married when their sexual identity became known to their community, representing a step in the exploitation through THB.

Latin American states were also mentioned as common countries of origin among this victim group. LGBTQIA+ THB victims, mostly transwomen, from Latin America reportedly migrate to the Baltic Sea Region, either as part of a THB scheme from their countries of origin or to carry out gender-affirming care. This care is often expensive and due to a generally marginalised economic position for this group, they seek alternative income sources, including selling sexual services, sometimes resulting in being exploited sexually. Overall, due to the economic marginalisation in society of LGBTQIA+ persons, it was reported that individuals sometimes sell sex as a last resort due to high levels of desperation, unknowingly taking the risk of ending up exploited for sexual purposes through THB.

Similarly, understanding the intersectionality of all THB victims is vital when understanding the vulnerability of LGBTQIA+ THB victims or LGBTQIA+ persons selling sexual services, as this group is stigmatised in more than one way. Identifying as LGBTQIA+, being a migrant, and being a victim of THB are all marginalising aspects by themselves, with a combination of them all resulting in severe vulnerability, as observed by key stakeholders in the CBSS Member States. Part of this is understood to come from a high degree of fetishisation for LGBTQIA+ persons, in particular transwomen. The fetishisation could be understood as making a person, or a subject, into an object, thus taking away feelings or emotions from the person, which already is common practice when it comes to victims of THB for sexual exploitation.⁹⁸ Thus, increasing this victim group's vulnerability to their exploiters further. An effect of this is that transwomen, in particular, have been observed to suffer severe and extreme sexual violence when selling sexual services and being exploited for sexual purposes through THB.

LGBTQIA+ THB victims are often overlooked for support services and effective access to rights and remedies, exemplified by a general lack of safe housing,

98 Keller, P., 'Objectified women and fetishized objects', *Journal of Ethics and Social Philosophy*, 2021

especially for transwomen. Very few organisations in the region have safe housing for transwomen victims of THB, with the traditional safe houses for women not accepting other genders into their spaces despite their vulnerable position. LGBTQIA+ victims of THB for the purpose of sexual exploitation, or who sell sexual services, are often identified and supported by LGBTQIA+ NGOs, rather than THB support NGOs. These organisations also tend to be close to the migrant LGBTQIA+ communities in their states. Domestic LGBTQIA+ victims of THB might not occur in the same spaces or be seen as potential victims of THB as THB is often generally seen as a migrant issue. As many other services to THB victims are provided through or via the safe shelters or housing, LGBTQIA+ victims often miss out on these as well, not only the safe housing.

LGBTQIA+ organisations lamented the lack of services available and fitting for victims of THB who identify as LGBTQIA+. Due to the many layers of marginalisation and vulnerability, LGBTQIA+ stakeholders urged for greater attention to this victim group, ensuring better protection and individualised access to services.

8.2. NEED TO FOR A WIDENED UNDERSTANDING

It was evident through discussions with key stakeholders that the understanding of THB is still predominantly heteronormative. It is common to apply a heteronormative understanding to THB or prostitution, and some countries make a direct connection to violence against women. As such, and without mentioning men or LGBTQIA+ as groups exploited for sexual purposes, these other groups are often made invisible. Updating legislation and policy to include all genders or sexual identities is seen as important among LGBTQIA+ practitioners, while emphasis could still be on women as the main victim group nationally, regionally, and globally.

While it is vital to acknowledge that men are the main group of buyers of sexual services and perpetrators, the victim group is more heterogeneous. As discussed above, it is common in many CBSS Member States that presumed or identified victims of THB identify as LGBTQIA+, men, women, or transgender. This means that men exploit men who might identify as either heterosexual or LGBTQIA+, women identifying as LGBTQIA+, or transgender individuals. Thus, while much focus and understanding of the connection between LGBTQIA+ and THB is on transwomen, it is vital to also understand that women exploited for heterosexual purposes might identify as LGBTQIA+. Understanding the victim group, their marginalised background, and layers of vulnerability, is thus central to ensure specialised and accurate support to the victim.

8.3. LACK OF COORDINATION – ISSUES AND SOLUTION

The lack of coordination and collaboration between THB specialised organisations and the LGBTQIA+ community or organisations was evident throughout the work with this report. Few states have active collaborations between NGOs from these two fields, resulting in a limited understanding of the marginalisation factors and vulnerability of LGBTQIA+ persons in THB or who sell sexual services. Furthermore, it was evident that in states where an active collaboration does exist, the general knowledge is higher and the support provision more specialised. The general lack of collaboration resulted in limited possibilities to gather information from

LGBTQIA+ organisations with knowledge of THB, which is a gap for this report. It should also be noted that in contact with LGBTQIA+ organisations, many had limited knowledge about the intersection of LGBTQIA+ and THB in general, or no interest in discussing the issue for this report. Anti-trafficking stakeholders need to further include the LGBTQIA+ perspective and key LGBTQIA+ stakeholders in contact with this victim group, as this would lead to greater attention and more knowledge production on the subject.

9

GOOD PRACTICES

State actors and NGOs from across the CBSS Member States have developed and implemented a range of successful initiatives for combatting THB. These contribute to strengthening various aspects of anti-trafficking work, such as prevention, victim identification and support, and investigations. This section will provide an overview of key good practices from each country.

9.1. DENMARK

9.1.1. Reden The Nest International's Night Café

The NGO RedenThe Nest International operates a Night Café in Copenhagen, which offers women in prostitution food, counselling on safe prostitution behaviours, and other types of support. It was established because the organisation identified a growing need to offer a place to stay at night for vulnerable foreign women in prostitution. The café is open three nights a week between midnight and early morning, and it is attended by up to 15-40 women per night.^{99 100}

9.1.2. Mobile health clinics

Mobile health clinics, established through a collaboration between the the Danish Centre against Human Trafficking (CMM) and the NGOs AmiAmi and Reden the Nest International, now run by the two NGOs, serve as important outreach tools. These clinics target massage parlours as well as more hidden forms of prostitution, such as escorts and prostitution in private residences.¹⁰¹ Operated by healthcare professionals, the clinics provide health checks and offer advice to women in prostitution.¹⁰² The purpose of the mobile health clinics is to create contact with women in prostitution who may be victims of human trafficking, so that they can be referred for assessment by the CMM.

9.1.3. The Danish Centre against Human Trafficking

The Danish Centre against Human Trafficking (CMM) is a state agency dedicated to coordinating Denmark's anti-trafficking work, with a focus on providing support to victims. Operating under the Danish Authority of Social Services and Housing, CMM identifies victims of trafficking and provides them with assistance. It also disseminates knowledge about human trafficking, as well as offers training and education to stakeholders. CMM aims to ensure accessibility to its services by operating a 24/7 hotline open every day, which allows individuals experiencing or witnessing THB to get in touch with their team at any time.¹⁰³

99 Reden International, 'About Us'

100 Reden International, 'Volunteer Policy for Reden International', 2023

101 GRETA, 'Denmark: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings', Council of Europe, 2021

102 Danish Centre against Human Trafficking, 'The Danish Centre against Human Trafficking', 2024

103 Danish Centre against Human Trafficking, 'The Danish Centre against Human Trafficking', 2024

9.1.4. Webscraping through AI

To improve the outreach work and gather knowledge on combat online exploitation of victims of THB into prostitution, the CMM, together with the NGOs AmiAmi and the Nest International, and the South Jutland Police department have initiated efforts of web scraping on sites for sexual advertisement., which are common places where THB victims are put up for sale by their traffickers. While the Police work with webscraping for victim identification and to identify perpetrators, the CMM have developed the tool for the two NGOs to use it in their outreach work, do so in online outreach purposes, aiming to better reach women in prostitution and exploitation through new arenas online. The project has also included a research team in the work with indicators of trafficking – called the Sexual Trafficking Identification Matrix. These efforts both increase the level of knowledge of crime nationally, and the information is shared with international stakeholders, such as the Europol, for increased capabilities of international cooperation and detection of crime.¹⁰⁴

9.1.5. Collaboration between THB and LGBTQIA+ organisations

CMM collaborates with the Danish NGO LGBT Asylum (<https://lgbt asylum.dk/>) on specific cases where the victim identifies as LGBTQIA+. Here, they can receive a safe social network, counselling and support.

104 Denmark, Roundtable Discussion, 29 August 2024

9.2. FINLAND

9.2.1. Collaboration between THB and LGBTQIA+ organisations

The NGO Pro Tukipiste, which works with individuals in the sex industry, collaborates with the LGBTQIA+ organisation Helsinki Pride to do prevention work. This cooperation arrangement allows the organisations to reach communities in vulnerable situations and provide them with sex education and information about their rights.¹⁰⁵

9.2.2. Specialised Police unit in Helsinki

In 2021, the Helsinki Police Department established a unit specialised in investigating human trafficking. It is divided into three investigation groups: two national ones on sexual exploitation and labour exploitation, and one group that addresses labour exploitation in the Helsinki area. Police departments in other regions can have support from the national team when needed. The unit includes experts in financial crimes, violent and sexual crimes, surveillance and covert operations, and cybercrime.¹⁰⁶ It has been effective in prevention work, victim identification, and ensuring that victims have access to rights and remedies.¹⁰⁷

9.2.3. Independent rapporteur

The function of National Rapporteur on human trafficking is performed by the Non-Discrimination Ombudsman. The task of the Rapporteur is to examine the work to combat human trafficking in Finland as an independent body. The rapporteur submits an annual report to the Government and a report with recommendations to Parliament every four years. In addition, it issues public statements and produces reports.^{108 109}

9.2.4. Investigation protocol for police

2024, the Police of Finland developed a handbook for investigating human trafficking crimes. It provides police investigators, as well as other relevant authorities and organisations, with practical knowledge about the investigation of human trafficking and related offences, along with best practices. To support multidisciplinary cooperation, the content of the handbook has been developed by experts from the Police, the Police University College, the prosecution service, other authorities, and the third sector.¹¹⁰

105 Finland, Roundtable Discussion, 3 October 2024

106 GRETA, 'Finland: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings', Council of Europe, 2024

107 Finland, Roundtable Discussion, 3 October 2024

108 GRETA, 'Finland: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings', Council of Europe, 2024

109 The Non-Discrimination Ombudsman, 'Task of the National Rapporteur on Trafficking in Human Beings'

110 Police of Finland, 'Ihmiskaupparikosten esitutkintaan on laadittu yhtenäinen toimintamalli', 2024

9.3. ESTONIA

9.3.1. School visits by the Social Insurance Board

The Estonian Social Insurance Board has launched an awareness-raising campaign that provides school pupils with information about what human trafficking is, why it is damaging, and how youth can identify it. As of October 2024, the campaign had reached around 1000 students aged 16-18.¹¹¹

9.3.2. Training of restaurant and hotel unions

Estonian state actors have conducted training sessions on human trafficking and exploitation for restaurant and hotel unions to improve the ability of professionals in this sector to detect signs of exploitation. The aim of providing a wider audience with training is to improve the identification of victims and perpetrators and promote a trickle-down effect in Estonian society as a whole.¹¹²

9.4. LITHUANIA

9.4.1. Regular amendments to the National Referral Mechanism

Yearly amendments to the National Referral Mechanism through State and NGO collaboration aim to ensure that the NRM is well-functioning and effective. This ensures that the individuals encountering both authorities and key NGO service providers receive the support, rights, and remedies they are entitled to through a clear and effective process.¹¹³

9.4.2. Take the Test website

IOM Lithuania administers the *Prekybos Žmonėmis* (“human trafficking”) website, which provides information on the risk factors of human trafficking and the assistance available for migrants and potential victims of trafficking. For example, it contains a test that allows users to evaluate their risk of being exploited, actionable advice for staying safe, and details of help and support services. Additionally, the website has information on training sessions about human trafficking that the IOM offers for professionals in relevant fields, such as educators, youth workers, and psychologists. The website is available in Lithuanian, English, Ukrainian, and Russian.¹¹⁴

9.4.3. Specific referral mechanism for children

The Municipal Child Rights Protection Department is responsible for coordinating the identification and assistance for child victims of trafficking. Authorities and NGOs involved in identifying victims of human trafficking should notify the

111 Estonia, Roundtable Discussion, 17 October 2024

112 Estonia, Roundtable Discussion, 17 October 2024

113 Lithuania, Roundtable Discussion, 30 October 2024

114 IOM Lithuania, *Prekybos Žmonėmis*, 2025

department if they identify a child victim. The department will then organise the necessary assistance services for the child. In addition, the Municipal Child Rights Protection Department has the authority to identify child victims directly.¹¹⁵

9.5. LATVIA

9.5.1. Specialised police work

The Latvian State Police has a specialised Anti-Trafficking Unit, which investigates cases of THB and related crimes.¹¹⁶ The unit has enabled the number of successful investigations to increase. Additionally, the Police has newly established internal processes and work on image recognition on key online advertisement sites, implementing specialised software to make this work more effective.¹¹⁷

9.5.2. Social Path System

The Social Path System aims at socially rehabilitating victims of THB to enable them to reintegrate into society. As part of the system, NGOs provide victims with legal and psychological consultations. Victims have access to up to 20 consultations as well as legal assistance in court proceedings for up to six months. If a criminal process is initiated, the person can have legal assistance for up to three years. A potential victim of THB needs to be granted rehabilitation services through the Social Integration State Agency before accessing the services through the NGOs. As part of this procedure, the Anti-trafficking Unit of the State Police grants victims of THB their recovery and reflection period.¹¹⁸

9.5.3. Cooperation between key NGOs

The NGOs Centrs Marta and Shelter “Safe House” have concluded agreements with the Ministry of Welfare to provide support and assistance services to victims of trafficking.¹¹⁹ The organisations are similar in their approaches, but with complementary areas of focus and strengths. Centrs Marta is stronger in providing psychosocial and trauma care to victims of violence, while Shelter Safe House has a strong legal team and expertise in migration issues.¹²⁰

115 GRETA, ‘Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Lithuania: Second Evaluation Round’, Council of Europe, 2019

116 GRETA, ‘Latvia: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings’, Council of Europe, 2022

117 Latvia, State Actor Roundtable Discussion, 27 September 2024

118 GRETA, ‘Latvia: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings’, Council of Europe, 2022

119 GRETA, ‘Latvia: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings’, Council of Europe, 2022

120 Latvia, Non-Governmental Actor Roundtable Discussion, 1 November 2024

9.6. POLAND

9.6.1. IOM training for LOT Airlines

For several years, IOM has implemented a training programme for the cabin crew of LOT Polish Airlines, enhancing their ability to identify victims of THB. This initiative was initially launched with the support of the Ministry of Interior. Before the training sessions, there had only ever been one report from cabin crew on suspected cases of THB onboard a LOT airplane. During the first year following the trainings, nine cases were reported. Due to their effectiveness, the trainings have continued and increased in size. IOM now conducts trainings of trainers sessions to foster internal competency at LOT and ensure that capacity-building becomes a peer-to-peer activity.¹²¹

9.6.2. State-NGO collaboration

The National Consulting and Intervention Centre for Victims of Trafficking (KCIK) is a key institution in Poland's anti-trafficking work. It is run by specialised NGOs selected by annual tenders. Currently, it is operated by La Strada Poland and PoMOC. Aiming to provide low-threshold services, the KCIK is tasked with identifying victims, providing assistance, and running shelters.¹²² It also provides consultancy services to organisations. In practice, the activities of KCIK include operating a hotline for victims and witnesses, providing safe accommodation, and offering counselling, medical help, and legal advice to victims.¹²³

9.6.3. Harsher punishments for perpetrators

Polish legislators have recently taken steps to increase the punishment attached to THB, with specifically harsh punishments for those exploiting vulnerable Ukrainian citizens. The efforts are aimed at deterring traffickers in their efforts. Following these updates, the maximum punishment for trafficking is 20 years in prison, and in cases involving Ukrainian victims, the punishment is 25 years.¹²⁴

9.6.4. Regional work through the Voivodeship

Poland's regional Voivodeship (province) teams bring together diverse stakeholders working with anti-trafficking. The teams are usually composed of representatives of the voivodeship offices, the Police, the Border Guard, the Prosecutor's Office, local governments, educational institutions, and NGOs. They provide victims of THB with support in the social assistance system setup and implement awareness-raising campaigns. The Voivodeship teams can propose new ways to combat THB and provide decision-makers with suggestions on how to increase the effectiveness of anti-trafficking activities. This setup has provided the regions in Poland with better coordination structures on the work and the collaboration between key stakeholders in anti-trafficking work in the country.¹²⁵

121 Poland, Roundtable Discussion, 18 September 2024

122 GRETA, 'Poland: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings', Council of Europe, 2023

123 The National Consulting and Intervention Centre for the Victims of Trafficking, *About Us*, 2024

124 Poland, Roundtable Discussion, 18 September 2024

125 CBSS, 'Human Trafficking – Baltic Sea Region Round-Up Report 2022', 2022

9.7. ICELAND

9.7.1. 112 emergency hotline

The national emergency hotline 112 has a central role in providing information to both victims and people who come across potential victims. Public officials who encounter a possible case of human trafficking are supposed to call the helpline to receive instructions on the actions they should take.¹²⁶ Additionally, the website of the hotline includes an [information portal about human trafficking](#). It contains information in English, Icelandic, and Polish about indicators of trafficking and resources for advice and assistance. The site includes concrete examples and makes it easy for potential victims of THB to reach out through an anonymous chat with emergency services.¹²⁷

9.7.2. Small working groups

Icelandic authorities have discussed the possibility of setting up small working groups to discuss THB cases, so that key actors can stay up to date on the latest developments and individuals identified as victims.¹²⁸

9.8. NORWAY

9.8.1. Lightup Norway's youth work

The NGO Lightup Norway does outreach work in school environments with both youth and their parents. Spread across Norway, the organisation educates their target groups on the vulnerabilities of youth on the internet, porn, prostitution, and THB for the purpose of sexual exploitation. The discussions focus on the damaging effects that porn can have on youth sexuality and the harms of porn use among youth. An extension of this is that the organisation discusses with their target group sexual boundaries and the consequences one's actions can have. This includes, for example, sending sexual content to someone online or engaging in sexual acts one is not comfortable with.¹²⁹

126 GRETA, 'Iceland: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings', Council of Europe, 2023

127 112 Iceland, 'Human Trafficking'

128 Iceland, Roundtable Discussion, 25 September 2024

129 Norway, Roundtable Discussion, 9 October 2024

9.9. GERMANY

9.9.1. Federal cooperation regarding child trafficking and exploitation

The Federal Cooperation Concept (BKK) “Protection and assistance in cases of trafficking in and exploitation of minors” is a framework that aims to improve cooperation between different stakeholders involved in supporting child victims. As part of the implementation of the BKK, ECPAT – with funding by the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth (BMFSFJ) - supports the establishment of regional networking structures. In addition, ECPAT organises interdisciplinary network workshops, specialist conferences in the federal states, as well as online and in-person trainings.¹³⁰

9.9.2. Prevention campaigns

The federal government has funded and implemented multiple prevention campaigns on sexual exploitation and the exploitation of minors. For example, the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth ran a campaign to raise awareness of support services for men. Additionally, the federal government funds the awareness-raising activities of organisations like the German NGO Network against Trafficking in Human Beings (KOK) and ECPAT.¹³¹ For example, KOK has run workshops in schools to educate youth on topics related to THB and sexual exploitation.¹³² State governments play an active role in prevention efforts as well. For example, In North Rhine-Westphalia, a campaign addressed the sexual exploitation of girls and women, while campaigns in Baden-Württemberg and Bavaria focused on combating the lover boy-method.¹³³

9.9.3. Counselling for sex workers

The Prostitute Protection Act of 2017 mandates prostitutes to attend counselling sessions provided by state-run health and regulatory authorities, such as registration and health counselling. Some of the state-funded counselling centres for prostitutes have received funding on providing specialised counselling about human trafficking and sexual exploitation. In addition, all German federal states provide funding for supplementary counselling offered by civil society organisations, that provide advice on social, legal or other support services.¹³⁴

9.9.4. (Child) protection standards in refugee facilities

The Federal state of Berlin has developed guidelines for the implementation of child protection standards in refugee facilities and for collaboration with the city's youth welfare offices and the State Office for Refugee Affairs.¹³⁵ Since 2016, Germany together with UNICEF and other partners conducts the initiative “Protection of Refugees in Accommodation for Refugees” (formerly “Protection

130 Institut für Menschenrechte, 'Monitor Menschenhandel in Deutschland', 2024

131 Institut für Menschenrechte, 'Monitor Menschenhandel in Deutschland', 2024

132 Germany, Roundtable Discussion, 1 October 2024

133 Institut für Menschenrechte, 'Monitor Menschenhandel in Deutschland', 2024

134 Institut für Menschenrechte, 'Monitor Menschenhandel in Deutschland', 2024

135 Institut für Menschenrechte, 'Monitor Menschenhandel in Deutschland', 2024

of Women and Children from Violence in Accommodation for Refugees”), which focuses on protection of people in vulnerable situations from violence, including sexual violence. In the scope of this initiative, “minimum standards for the protection of refugees in refugee accommodation” were developed, which have been complemented by annexes on disabled refugees, LGBTI persons and refugees with PTSD. The minimum standards serve as guidelines to design and implement protection concepts in housing units. In 2021, the minimum standards were revised and updated in a multi-stage process with the participation of the partner organisations, representatives from state ministries, state and municipal authorities as well as violence prevention coordinators and multipliers.¹³⁶

Since 2019 the German Ministry of Family Affairs, Senior Citizens, Women and Youth funds model projects to put the standards into practice - e.g. projects aimed to strengthen the rights of children in initial reception centres and other accommodation as the project “Listen up! Complaints procedures for children in reception centres” implemented by Save the Children Germany, to help protect and support refugee children. The project published several tools in 2024 on how to implement a complaint-system for children in refugee accommodation centres. The project ended on December 31st in 2024.

9.9.5. Training on victim identification

Various governmental and non-governmental organisations provide training to authorities such as the police, customs, BAMF, immigration authorities, social security offices, and youth welfare offices. For example, the Federal Office for Migration and Refugees (BAMF) has collaborated with ECPAT to conduct training sessions for its staff on the topic of trafficking and exploitation of minors.¹³⁷

9.9.6. Specialised counselling centre for child victims of trafficking

In 2024, the NGO IN VIA opened Germany’s first specialised counselling centre for trafficked children. It is located in Berlin and is funded by the federal state of Berlin was established. Berlin also published in March 2025 comprehensive new guidelines on protecting child victims of human trafficking, in close cooperation with IN VIA and in reference to the BKK “Protection and assistance in cases of trafficking in and exploitation of minors”.¹³⁸

9.9.7. National Reporting Mechanism

The German Institute for Human Rights (DIMR) functions as an independent National Reporting Mechanism. Its task is to collect data regularly to support and enhance reporting on THB as well as draw up recommendations for action. The National Reporting Mechanism prepares annual reports to the Federal Parliament as well as bi-annual status reports.¹³⁹

136 BMFSFJ, ‘[Minimum standards for the protection of refugees in refugee accommodation centres](#)’, 2021

137 Institut für Menschenrechte, ‘[Monitor Menschenhandel in Deutschland](#)’, 2024

138 IN VIA Berlin, ‘[Handlungsleitfaden Kinderschutz bei Handel mit und Ausbeutung von Minderjährigen](#)’, 2025

139 GRETA, ‘Germany: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings’, Council of Europe, 2024

9.9.8. State financing of KOK

KOK is an alliance of NGOs that manage counselling centres providing specialised assistance to victims of THB as well as other organisations working with anti-trafficking. Its activities include awareness-raising among the public, advocacy work, data collection and analysis, and the delivery of training for authorities, professionals and civil society. KOK has been funded by the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth since 1999.^{140 141} This stable state funding has contributed to the network's ability to solidify its position as a key actor in Germany's efforts to combat human trafficking¹⁴².

9.10. SWEDEN

9.10.1. Regional coordinators against prostitution and human trafficking

Regional coordinators against prostitution and human trafficking, who are usually social workers employed by municipal governments, play a central role in Sweden's work against human trafficking. Their task is to support the Gender Equality Agency's national assignment concerning prostitution and human trafficking. Regional coordinators assist authorities, such as the police and social services, support trafficking victims and provide expertise in human trafficking. There are 15-20 regional coordinators covering the seven regions of Sweden, who meet monthly and hold regular meetings with the Gender Equality Agency and other authorities.¹⁴³

9.10.2. Good practices within judicial combatting of trafficking

Effective use of the provision which states a minimum punishment of prison, which means a two-year statutory limitation period, which enables the police to investigate further within the context of procuring and trafficking.

Additionally, the police can take DNA-sample from the suspect to match with other forensic traces and suspicions of crime meanwhile the suspect is under investigation which has led to an increase of detection of unrelated crimes and finding the perpetrator of cold cases.

Special units or sections, on trafficking or prostitution, enabling the police to do out-reach work. Without any outreach work, trafficking and prostitution is rarely detected. For example, in Stockholm, a special prostitution group, has a higher success rate than the rest of country, in implementing the sex purchase law.

9.10.3. MIKA Clinics

The Mika clinics are aimed at people who have experience of prostitution. They are also aimed at people who have been victims of human trafficking for sexual

140 German NGO Network against Trafficking in Human Beings, '[Against Trafficking in Human Beings. For Human Rights](#)', 2022

141 European Commission, '[Germany - Institutional, legal and policy framework to address trafficking in human beings](#)'

142 Germany, Key Informant Interview, 18 November 2024

143 GRETA, 'Sweden: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings', Council of Europe, 2023

purposes. They offer conversations, support and practical help. People are welcome to the Mika clinics regardless of age, gender and sexual identity. Relatives, partners or friends who are worried about someone can also turn to them. The clinics can be found in bigger cities across the country.

9.10.4. ECPAT's payment indicator system

ECPAT Sweden's initiative 'Project Indicators' developed a payment indicator system in collaboration with banks to prevent livestreamed sexual exploitation of children online. The project analysed court cases to identify indicators such as perpetrator profiles, payment methods, and payment amounts. Test runs using these indicators led to the identification of suspicious transactions, which were referred to the Financial Intelligence Unit as possible cases of child sexual exploitation. The project demonstrated that it is feasible to detect and hinder financial transactions linked to livestreamed child sexual abuse.¹⁴⁴

9.10.5. ThaiWISE

The ThaiWISE project is an initiative of the organisation Hela Människan in Malmö, run in collaboration with, and with funding from, the Malmö Municipality. It offers information, guidance and training for Thai women in Sweden. Thai women who become victims of THB in Sweden are frequently exploited in massage parlours, and ThaiWISE aims to address this issue by raising the standards of traditional Thai massage in the country. Its activities include managing a certification scheme for massage parlours, conducting trainings on workers' rights, and providing massage entrepreneurs with guidance on complying with Swedish laws and regulations. In addition, ThaiWISE operates a helpline for Thai people who experience or are at risk of violence or abuse.¹⁴⁵

9.10.6. Inte Din Hora

Inte Din Hora is a non-profit organisation based on volunteer activities, created by and for individuals with lived experience of prostitution. Its work focuses on outreach to the public, professionals, and politicians. In addition, the organisation maintains a peer support network.¹⁴⁶ Inte Din Hora also operates the Var Är Jag ("Where Am I") chat, which targets individuals who sell sex but are not trafficked. It enables the individual to share their location with the organisation, ensuring their safety. If they fail to check in as planned, Inte Din Hora will contact the police and provide them with the location.¹⁴⁷

9.10.7. 1000 Möjligheter

The foundation 1000 Möjligheter provides preventive and supportive services to children and young people, focusing on issues of power, gender, and violence. One of the foundation's focus areas is prostitution. 1000 Möjligheter operates a national chat-helpline which provide support and help for young people in prostitution and runs a therapeutic centre in Stockholm that provides assistance, advice and therapy.

144 ECPAT, 'Project Indicators', 2020

145 ThaiWISE, 'ThaiWISE – Thai Women in Sweden Empowerment', 2023

146 Inte Din Hora, 'Om Oss'

147 Sweden, Roundtable Discussion, 15 October 2024

It also offers training to professionals on the subject of youth in prostitution.¹⁴⁸

9.10.8. Information campaign for boys and men

The Swedish Gender Equality Agency's information campaign, Låt inte tystnaden tala ("do not let silence speak"), aims to raise awareness about how boys and men can contribute to preventing prostitution and sexual exploitation. The campaign features videos that encourage young people to speak up if they hear someone they may know thinking of buying sex, as well as videos targeting men on their way abroad. The video is accompanied by a webpage with questions and answers about consent, sexual exploitation, and prostitution.¹⁴⁹

148 1000 Möjligheter, 'About 1000 Möjligheter'

149 Swedish Gender Equality Agency, Låt inte tystnaden tala, 2023

10

CONCLUSION

Trafficking in human beings for the purpose of sexual exploitation remains a persistent and evolving challenge in the Baltic Sea Region. The findings from the primary and secondary sources, underscores the complexity of this issue, revealing significant developments in both victim demographics and perpetrator methodologies. Despite continuous efforts by CBSS Member States to strengthen legislative frameworks and support systems, key obstacles hinder effective prevention, victim protection, and the prosecution of perpetrators.

One of the most significant findings is the increased marginalisation and vulnerability of certain groups. While women and girls remain the primary victims, in line also with the global trend, emerging trends indicate that LGBTQIA+ persons may face heightened risks, yet their specific vulnerabilities remain largely overlooked. This highlights the need for an intersectional approach, moving beyond heteronormative frameworks to better address the realities of all victims. Furthermore, the report emphasizes that the majority of victims originate from Eastern Europe or the Global South, reinforcing patterns of systemic discrimination and economic hardship as enabling factors of exploitation.

Another key development is the shifting landscape of sexual exploitation. The rapid digitalisation of trafficking networks and the transition from public to hidden spaces, including short-term rentals and online platforms, have in a sense managed to both increase and decrease the invisibility of potential THB. This shift has exacerbated the challenges of victim identification and intervention while providing traffickers with new tools to maintain control over victims with minimal use of physical violence. Youth victims, in particular, have become more vulnerable due to their digital presence, necessitating enhanced outreach efforts in online spaces. There are also unanswered questions, and to a certain sense overlooked aspects, regarding definitions. The pattern suggests that sexual exploitation involving youth victims of THB, including children, who are nationals in the Baltic Sea Region states tend to be categorised as victims of other types of sexual exploitation than THB, even when there is reason to believe that the crime they were subjected to might constitute as THB.

Despite existing international legal frameworks mandating access to rights and remedies, victims continue to face significant barriers to justice and support. Complex bureaucratic systems, competing legislative frameworks, and high evidentiary burdens often deter victims from seeking assistance. Moreover, the operational tactics of traffickers, such as frequent movement across borders and psychological coercion, further complicate efforts to ensure long-term protection and rehabilitation.

The report identifies several good practices that have been implemented to address these challenges. These include long-term state funding for NGOs, improved collaboration between key stakeholders, and the establishment of low-threshold support services that make victim assistance more accessible. However, the need for sustained commitment and innovation in these areas remains evident.

Discouraging demand for sexual exploitation is a crucial component of anti-trafficking efforts, as reflected in international legal frameworks. However, disparities persist in how CBSS Member States implement demand reduction strategies. While public education campaigns are commonly employed, there is limited evidence of their long-term impact, and legislative approaches vary significantly.

Additionally, there is a noticeable gap in discussions about complementary measures beyond legislation to address demand structurally.

To combat THB effectively, the importance of adopting a holistic and intersectional approach must be underscored. Beyond legislative efforts, proactive strategies must include enhanced victim identification mechanisms, targeted digital interventions, and strengthened cross-border collaboration. Policymakers and stakeholders must also address underlying socio-economic inequalities that drive or enable THB, ensuring that efforts are not only punitive but also preventive and restorative.

In conclusion, while progress has been made in combatting THB for the purpose of sexual exploitation, persistent and emerging challenges demand sustained and adaptive efforts. A multi-stakeholder approach, prioritising victim-centered responses and innovative prevention strategies, is crucial to effectively addressing this pressing issue in the Baltic Sea Region.

11

GAPS AND RECOMMENDATIONS

The intersection of LGBTQIA+ identities and THB for the purpose of sexual exploitation remains significantly understudied and often overlooked. Throughout the work with this report, it was proven difficult to establish contact with LGBTQIA+ organisations and establish a dialogue on THB. To address this, CBSS Member States should strengthen efforts to integrate LGBTQIA+ perspectives into anti-trafficking policies, taking into account the specific vulnerabilities of members from this group, and specifically when they have migrant backgrounds or are irregular migrants. A key good practice observed in some states is the establishment of dedicated collaboration networks between THB service providers and LGBTQIA+ organisations. These networks facilitate better outreach, create safe reporting mechanisms, and improve specialized support services for LGBTQIA+ victims, ensuring that their unique vulnerabilities are recognized and addressed. More states should consider initiating and expanding such collaborations to close gaps and ensure that LGBTQIA+ victims are not excluded, or overlooked, from victim assistance frameworks and systems.

As indications suggest that domestic trafficking may be on the rise in several CBSS Member States, a shift in perceptions and definitions is required. Traditionally viewed as a crime affecting primarily migrants, THB for sexual exploitation must be recognized as a domestic issue as well. Some states have successfully integrated intersectional analysis into their anti-trafficking strategies by examining how economic hardship, substance abuse, childhood trauma, and online exploitation contribute to increased domestic trafficking. The implementation of tailored prevention programs targeting at-risk youth, particularly those in institutional care, has proven to be an effective approach in several member states. Such programs should be expanded region-wide to strengthen early intervention and protection efforts.

Another emerging good practice is the use of digital tools to enhance victim identification and disrupt trafficking networks. Innovative initiatives such as web-scraping technologies - used to monitor online platforms where victims are advertised - and AI-driven detection systems have been piloted in some CBSS states with promising results. These tools help law enforcement and NGOs identify potential victims, track trafficking patterns, and improve rapid response mechanisms. Expanding such technology-driven solutions across the region, combined with enhanced training for frontline professionals on digital exploitation indicators, could significantly strengthen anti-trafficking efforts.

To discourage demand, CBSS Member States should consider ensuring discussions on what demand is and how to effectively discourage it, in line with international obligations. The research conducted for this report has highlighted a strong willingness among stakeholders to engage in such discussion and ultimately reach a unified understanding. Establishing national forums for dialogue on demand-reduction strategies - bringing together policymakers, law enforcement, service providers, survivors, and researchers - could be a valuable first step toward a unified and effective approach.

Finally, a victim-centered approach must be the foundation of prevention, identification, and support services. Legislative frameworks, service delivery

models, and intervention strategies must prioritize the needs, rights, and dignity of victims. Good examples include states that have implemented low-threshold support services, ensuring that victims can access assistance without facing bureaucratic hurdles or proof burdens. Another innovative approach seen in the region is long-term state funding for NGOs, recognizing their crucial role in providing direct victim support. Sustainable funding models are essential for ensuring that specialized service providers can continue their work without reliance on short-term grants.

Additionally, states that have developed specialized law enforcement units focusing on THB have demonstrated increased effectiveness in victim identification and case prosecution. These units, often working in close cooperation with NGOs, employ proactive investigation methods and trauma-informed interview techniques, making them more accessible and less intimidating for victims.

In conclusion, while the Baltic Sea Region has seen significant progress in tackling THB for sexual exploitation, further efforts are required to adapt to evolving challenges. Strengthening collaboration across sectors, investing in digital detection methods, fostering open discussions on demand reduction, and ensuring sustainable victim-centered policies are all essential steps to enhance the fight against trafficking and protect those most vulnerable to exploitation.

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