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Report on the End-user requirements

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Table of Abbreviations and Acronyms

Abbreviation	Meaning
THB	Trafficking in human beings
CSE	Child sexual exploitation
UCS	Use case scenarios
LEAs	Law enforcement agencies
VoT	Victims of trafficking
JITs	Joint Investigation Teams

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1 Introduction

Achieving an effective and efficient multi-stakeholder engagement between various public authorities, the private sector and civil society organisations on the one side, as well as strengthening the cross-border and transnational collaboration between law enforcement agencies, are among the most important objectives of the ERADICATING project. The deliverable[1] "Preparation phase – Training design and end user requirements" contributed to these objectives by presenting a total of 8 use case scenarios (real but anonymised cases provided by LEAs from Bulgaria, Germany and Greece) in the field of Trafficking in Human Beings (THB) and Child Sexual Exploitation CSE. These use case scenarios (UCS) outline the current landscape situation around these issues aiming try to identify main challenges, gaps, and novel areas, while beyond that additionally focusing on multi-stakeholder engagement, intra-national, cross-sectoral, as well as cross-border cooperation.

In regard to use case scenarios on cases in the field of THB, some important observations can be made. In the cases of THB for the purpose of sexual exploitation, all victims were from the states of Bulgaria, Romania or Moldova, while their age, if stated, was mostly young, although in most cases they were adult victims. It also became clear in many cases that THB very often takes place far across borders, often through structured organised crime groups that operate transnationally. Here, too, various possibilities were shown on the way police forces deal with this phenomenon and conduct cross-border investigations.

Regarding the modus operandi of the perpetrators, it is to be noted that they very often make use of the pretence of supposedly attractive, false job prospects and to the so-called 'loverboy'[2] method for initial recruitment. This is a very important finding, because this form of recruitment, the 'loverboy' method, is still not known to all officers in some police forces, because there is no specific training on this, which in consequence could make it almost impossible to identify victims of THB. That is why special attention was paid to this area: Loverboy tactics were illustrated in several use case scenarios, as it

[1] D2.1 of Work Package 2 (WP2).

[2] "A 'loverboy' is a pimp, usually a young man, who seduces young women, often minors, to force them into prostitution or other illegal activities. Loverboys establish a romantic relationship with their victims that quickly turns into an emotionally, psychologically and physically abusive one. The victims' situation is especially precarious, as the abuse takes place in their close or intimate relationship and in a state of complete emotional, psychological and financial dependency.
Sometimes also called Romeo pimps, teenage pimps or boyfriend pimps, loverboys tactics have become the most common modus operandi for the recruitment and exploitation of young women in the sex industry throughout Europe." (Source: https://www.payoke.be/loverboys/)

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needs more attention for more targeted and successful prevention, identification, and investigation of human trafficking cases.

Finally, what will be relevant for later activities within the framework of ERADICATING, a mixed form of exploitation was also pointed out, here using the example of sexual exploitation in conjunction with exploitation for the sale of drugs.

In the UCS on labour exploitation, all victims were from Bangladesh. Also, similar to sexual exploitation cases, the pretence of supposedly attractive, false job prospects was used for recruitment. Here, however, in contrast to the use case scenarios on sexual exploitation, a high level of violence and threat of violence was enforced on the relevant victims to carry out the exploitative activities. In most cases, the creation of dependencies and the isolation of the victims played a significant role in the (increasing) disempowerment of the victims.

In regard to UCS involving child sexual exploitation, while CSE primarily takes place in the physical world, in recent years child sexual exploitation has also become increasingly widespread on the internet. The two use case scenarios provided focus on two important manifestations of CSE online: On the one hand, the (attempted) initiation of sexual contact with children on the internet, and on the other hand, the dissemination of child sexual exploitation material. The first, so-called 'cybergrooming',[3] is by no means a marginal phenomenon, but is, according to experts, an offence of which many young people become a victim. A high proportion of female children who spend a lot of time on the internet and are active in chat forums and on social media platforms at some point become victims of (attempted) 'cybergrooming' and possibly subsequently to so-called 'sextortion'.[4] The perpetrators who blackmail their victim by using sexual content of the victim as a means of pressure, are mostly male and much older than their victims, oftentimes adults. Ultimately, the number of unreported cases may be very high and awareness-raising among potential victims and training of LEAs on this issue is essential to eradicate these dangers. The same applies to the dissemination of child sexual exploitation material. This issue too is of growing relevance and poses significant challenges to LEAs that require special attention. It must be emphasised that this is by no means only about the dissemination of such material, but the prosecution of the sharing oftentimes makes it possible to investigate on and to end incidents of severe and ongoing child sexual abuse. Last but not least, although estimates in this field are highly difficult, experts assume that about 10% of these individuals who share CSE material online are or were also actively engaged in the underlying physical CSE.

[3] 'Cybergrooming' is the process of 'befriending' a young person online "to facilitate online sexual contact and/or a physical meeting with them with the goal of committing sexual abuse.

[4] "Nudes" (self-produced, explicit photos) are sometimes misused or used as a means of pressure to blackmail the person depicted. "Sexting" thus becomes "sextortion" when one is persuaded or pressured to take such pictures and is finally blackmailed. Sextortion is a portmanteau of "sex" and "extortion". According to German law "Sextortion" is considered as extortion under criminal law and is therefore a criminal offence (legislation may differ in other countries).

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As another novel area, changes due to the COVID-19 pandemic and the associated restrictions in the prostitution sector were examined, pointing to additional challenges in victim identification and support and the shift to online methods by traffickers. Indeed, the use of internet and communication technology for recruitment and control has emerged as a third novel area in THB and especially CSE.

The present report and its recommendations reflect the Use-case Scenarios[5] and field work conducted[6] of the ERADICATING project on combating THB and CSE in Germany, Greece and Bulgaria. Its purpose is, based on an extensive inquiry into the needs of ERADICATING's end-users, to identify the main gaps, challenges, existing or novel ones, and good practices in stakeholders' work on THB and CSE, which will serve to design the practical products in the project's next phases.[7] The report's structure includes an introduction with the conclusions from the Use-case Scenarios (section 1); methodology (section 2); description of the main gaps and challenges in identification of victims of trafficking (VoT), the investigation and prosecution process, institutional capacity, inter-agency and cross-border cooperation and novel phenomena; good practices from the work of relevant actors; concrete training needs identified by respondents (Section 3); and recommendations for the following work packages and products, including a suggested structure of a training for law enforcement agencies (LEAs) and prosecutors (section 4). Specific subsections on children, their sexual and other exploitation and the approach to children were listed, reflecting the specific questions included in the interview questionnaires.[8] All relevant ethics and legal requirements of the project were taken into consideration.

2 Methodology

The methodology for the current task (see Annex I) was discussed and endorsed by the project partners. It was decided that a combined approach using semi-structured interviews and responses to a questionnaire (if interviews were not possible in the given case) would provide a purposive sample of law enforcement officials (the main target group of the project) and other relevant observers of the process. The methodology is constructed to elicit, identify, and prioritise end-user requirements.

The process included the identification of the main target groups of stakeholders (end-users) who could be interviewed as part of the data collection exercise and could subsequently participate in the trainings (WP4). They were listed as:

[5] Task 2.1.
[6] As part of Task 2.2.
[7] The comprehensive ERADICATING Footprint training tool (WP3) and the trainings and simulation in WP4.
[8] See section on Methodology for Task 2.2 and Annex I.

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- Law enforcement agencies (LEAs)
- Prosecutorial offices
- Labour inspectorates
- NGOs
- Social service providers
- Other officials involved in investigation and prosecution of trafficking offences (e.g., national coordination units, national rapporteurs or equivalent mechanisms)

Based on the target groups, seven focal areas of practice within the THB field were formulated:

- Identification
- Protection (From initial contact to after the end of the court case) and Support (Legal, Psychological) for Victims
- Interdisciplinary and cross-sectoral Cooperation (national and international)
- Investigational process
- International Police Cooperation (In joint investigations; in general; networking)
- Prosecution and Court Proceeding
- For Teachers and Trainers on (Management of) THB Cases

In each focal area, a set of questions was developed to be used in the interview phase. The questions addressed the main objective of the task, i.e., identifying the main gaps, challenges, novel areas, good practices and ways of improvement in the everyday work of the respective stakeholders, including in the sphere of inter-agency and cross-border cooperation.

The field work itself comprised 26 semi-structured interviews or responses to the previously agreed upon questionnaires for stakeholders, according to the availability and readiness to engage on the part of respondents. The interviews were conducted by five project partners in the three Member States of focus – Bulgaria, Germany and Greece – in the period March-April 2022; where interviews were not held, responses of the questionnaire were received in the same time period. A total of 13 government agencies were contacted (officials from interior ministries, police, anti-trafficking coordinating bodies or retired policemen with experience in the field); four representatives of judicial authorities (prosecutors or investigating judges); and nine representatives of civil society organisations or lawyers focusing on victims' rights. Some of the interviews were attended by more than one person from the respective agency, and all of them took active part and provided responses; that is why the number of the interviewees below is higher than the number of interviews conducted. The breakdown of the interviewed stakeholders is as follows:

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Table 1. Structure of the interviewed end-users as part of Task 2.2 field work

	Germany	Greece	Bulgaria
Government officials	7	2	7
Judiciary	1	2	1
Civil society	3	3	3
TOTAL interviews	11	7	7
TOTAL stakeholders	11	7	11

3 Main findings

Following is a summary of the key findings of the field work for the current task of the project, broken down according to the focal areas described in the methodology and the specific areas which emerged in the interviews. One important challenge in terms of identification of victims of trafficking, as shared by interview respondents in all three countries of focus, was that victims frequently **do not self-identify as victims** or that they realise they are being exploited. Very often victims are not willing to speak with the authorities, especially police. Another hurdle in identification is the **capacity and skills of first-line officials and people in contact with potential victims**. These include labour inspectors, social workers, immigration officials, teachers. This may result in failure to make a distinction between human trafficking and people smuggling or to detect some different forms of exploitation such as forced begging or trafficking for forced criminal activity. Sometimes the capacities of authorities outside the capitals and major cities are also insufficient. Legislation is also mentioned as a problem in Bulgaria and Greece regarding labour exploitation and other forms of trafficking such as forced begging. **Protection** and **reintegration** of victims was also described as problematic. Victims' **families and friends** can be put under pressure. Most respondents agreed that, in regard to trafficking of **children**, identification and protection are specific and even more difficult. It is even more sensitive when the **child's family** is involved - with children the hardest part is where they will be returned, **how their lives will continue after trafficking.**

In regard to investigation and prosecution, most respondents in the current study with LEA or prosecutorial background agreed that the **unwillingness to testify** of the victim

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may be the most serious challenge in their work. Witnesses often do not testify or **do not testify truthfully**, and without this input a conviction is difficult to achieve. Some respondents mentioned that the right **approach to the victim** may sometimes be missing: securing proper legal representation and gaining the victim's trust. **Legal hurdles, collection of evidence and time span** of the trial were also mentioned as problems in the investigation and prosecution phase. **New forms of human trafficking**,[9] such as trafficking for forced begging or for sham marriages, have presented difficulties for investigators. One specific gap which was identified by LEAs and prosecutors from all three countries in focus pertains to **parallel investigations** and more specifically **financial investigations**, as well as **confiscation of assets**. Another gap is linked to using **new information and communication technologies** in investigation.

Interviewees from all three countries of focus pointed to challenges linked to the institutional capacity of stakeholders directly or indirectly involved with addressing human trafficking. These include **insufficient or overwhelmed personnel, sizeable staff turnover, low pay and lack of government funding for the operations of institutions** on a daily basis. The personnel referred to comprises a variety of profiles: police, prosecutors, judges, officials at anti-trafficking coordinating bodies, social workers, teachers, inspectors of brothels and interpreters. Lack of **infrastructure, operational capacity and sustainable funding** is mentioned as a serious drawback, specifically in Bulgaria.

Regarding inter-agency cooperation in combating THB, most of the interviewees were able to share positive examples of interaction with other stakeholders, specific ones or in general. However, there were also gaps and challenges identified. One of the criticisms relates to the **absence of structured, formalised mechanisms** of interaction or, even when these are existent, to their inefficient functioning. Somewhat paradoxically, other stakeholders called for more **personalised, informal interactions** among institutions for the sake of efficiency. This was also observed about international cooperation, seen in the absence of **contact points** in different countries. Other challenges in international cooperation involve **slowness or sometimes lack of communication**. **Data exchange** among institutions is identified as a hurdle, too, as is the **lack of trust** between government and non-government actors. Most actors agree that inter-agency and cross-border cooperation when handling **child victims of trafficking and CSE** is important and these victims require a careful approach.

The novel challenges identified by interviewees can be grouped as general, linked to the internet and new technologies, COVID-19-linked and those related to refugees from the war in Ukraine. Regarding general trends, one is that the nationalities of the victims are shifting more and more **towards the East** and there is an **increase in women** immigrants or refugees who were victims of THB abroad and are arriving in the EU. Interlocutors from all three countries of focus agree that the **internet** and **new**

[9] DIRECTIVE 2011/36/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims, and replacing Council Framework Decision 2002/629/JHA.

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technologies present serious challenges for practitioners. The **COVID-19 pandemic** presents a third challenge, despite its initial effect of decreased cross-border movements. Respondents mentioned harder identification, access to services for victims and delayed or declined trials. The war in Ukraine and the risks for THB among the very vulnerable groups of Ukrainian women and children, the essence of the refugee numbers, is a fourth novel challenge.

In terms of good practices, end-users mentioned the **legal** environment, **inter-agency and cross-border cooperation,** especially with NGOs, **policy responses** and government structures, specifically designed to address THB, cooperation on the **local level** and on the **international level**, especially among LEAs in the form of Joint Investigation Teams (JITs).

Following is a detailed description of the outstanding issues, along the lines of the focal areas in the methodology and the specific areas which emerged in the interviews.

3.1 Gaps and challenges in the identification, protection and support of victims of trafficking

One important challenge in terms of identification of victims of trafficking, as shared by interview respondents in all three countries of focus, was that victims frequently **do not realise that they are victims** or are being exploited. This is especially valid for labour exploitation. Sometimes the boundary between whether a sex worker is acting out of her own free will, pushed by poverty, or there is an element of coercion is very thin.[10]

> *"In cases of sexual exploitation, very often victims don't self-identify as trafficked persons, and the reasons for this are because they are tied to the traffickers and they are recruited through the "loverboy" method… they believe they are working for the welfare of their partner who is anyway sexually exploiting them, taking their earnings, restricting their freedom etc. Along the lines of labour exploitation, I think that there is a weak self-identification because the individuals who are exploited… are not aware of the components of the crime of human trafficking. And consequently they cannot identify themselves as victims, on the one hand, and on the other hand the traffickers manipulate them into believing that in fact this period of non-payment, poor living conditions, poor working conditions is temporary and it will stop the moment they pay their debt."*[11]

> *"I think the biggest challenge might be the initial contact itself. Many victims never contact us, at least I assume they don't, and they don't contact anyone else who would pass this on to us... suspected victims do not really trust the police for certain reasons and do not talk to us."*[12]

> *"Many times VoT are not willing to speak with the authorities, especially Police. Perpetrators usually tell them that the police is being paid by them or they afraid for their families abroad.*

[10] Interview with a representative of German civil society, 31 March 2022 (C01).
[11] Interview with a representative of Bulgarian civil society, 25 March 2022 (C09).
[12] Interview with a representative of a German LEA, 4 April 2022 (G02).

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They may have grown up in a country with highly corruption or with poor education so they believe in their perpetrators. They don't feel safe and they have been instructed what to answer to LEAs questions… Because VoT many times don't want to talk to the police, it may be difficult to detect and identify a THB victim after a police check."[13]

Another hurdle in identification is the **capacity and skills of first-line officials and people in contact with potential victims**. These include labour inspectors, social workers, immigration officials, teachers.

"I think the challenges are that there are very few professionals who work on human trafficking and actually have the knowledge and expertise to identify VoT."[14]

"Many officials [labour inspectors] who carry out such checks are not really trained for this either, at least not sufficiently, and actually have to inform themselves. So there is only this list of indicators and the questionnaire."[15]

"The gap is a lack of awareness for identification, among teachers and other actors... And often the necessary knowledge, the necessary skills are lacking."[16]

This may result in failure to make a distinction between human trafficking and people smuggling[17] or to detect some **different forms of exploitation** such as forced begging or trafficking for criminal activity.[18] Sometimes the capacities of authorities outside the capitals and major cities are also insufficient.[19] **Legislation** was also mentioned as a problem in Bulgaria and Greece regarding labour exploitation and other forms of trafficking such as forced begging.[20] A Bulgarian interviewee said that a particular challenge was identification of victims among **third-country nationals**, the main reasons being the existing procedures and the fact that for most migrants from the Middle East and Asia Bulgaria is a transit country and they do not want to have any contact with authorities until they reach their final destination in Western Europe.[21] A German respondent underlined the importance of a **personal approach** by police officers and their ability to understand the victim, which was not always the case.[22]

Protection of victims was also described as problematic.

*"Victim protection is the weakest link in the chain. There is hardly any way to make it better. Of course, victim protection in Germany should be intensified. But the victims usually have **families and friends** somewhere who can also be put under pressure. And most of the time, these families and friends don't even know that the victim has worked as a prostitute.*

[13] Interview with a representative of a Greek LEA, 4 April 2022 (G08).
[14] Interview with a representative of Bulgarian civil society, 25 March 2022 (C09).
[15] Interview with a representative of a German customs office, unit for illicit work and exploitation, 6 April 2022 (G01).
[16] Interview with a representative of the Bavarian Ministry of Education, 11 April 2022 (G03).
[17] Interview with a representative of Greek civil society (C05).
[18] Interview with a representative of Bulgarian civil society, 25 March 2022 (C09).
[19] Interview with a representative of Greek civil society (C04).
[20] Interview with a representative of Bulgarian civil society, 25 March 2022 (C07); Interview with a representative of Greek civil society (C04).
[21] Interview with a representative of Bulgarian civil society, 25 March 2022 (C07).
[22] Interview with a former representative of the Bavarian police, 28 April 2022 (G06).

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Accordingly, this alone is often used as a means of pressure… The victim has to completely cut off her previous life, which very few people want."[23]

"The main problem is how to secure the protection of victims ***outside the courts and the investigation offices****. More need to be done in this regard, especially on the part of police but more legal provisions would be needed in this regard. The same applies to facilities for sheltering victims. The main problem lies in the ensuring that any restrictive measures on accused persons and protective measures for victims are applied properly in practice and this burden necessarily falls to the police and other state authorities to ensure that indeed what us investigative judges and prosecutors order is actually applied in practice."*[24]

"I think the challenges are the ***reintegration*** *of victims to society and of course the protection of the victims in the country of origin when they are willing to repatriate… Sometimes victims continue to communicate through social media with their previous contacts, and that can jeopardize their safety and perpetrators can approach them via other persons."*[25]

Most respondents agreed that, as regards trafficking of **children**, identification and protection are specific and even more difficult.

"Children and adolescents simply cannot open up easily when it comes to the subject and find it very difficult to proactively seek help and protection… with children and young people this effect often seems to be even intensified… If protectees or caregivers are the perpetrators, then children will rarely approach other adults… In addition, children and sometimes also adolescents are often not even able to name what actually happened… Often they even feel guilty themselves and, or do not identify the wrongdoing with the perpetrator."[26]

It is even more sensitive when the ***child's family*** *is involved: "In these areas (when the perpetrators are the family or close people) it is often the case that the children are even more attached to the perpetrators because it is the family that is exploiting, or just trusted people, and because they are also even more afraid. They are even more afraid to testify and to defend themselves than an adult person."*[27]

"With children, actually, the hardest thing is where they will be returned, ***how their lives will continue after trafficking****. I think that's the hardest thing, because we know that in many cases, they come from such problematic families, even if the family was not involved in the trafficking itself, they sold the children or they exploited them… It means that this family is not doing its basic functions to create a safe and secure environment, it means that the family ties are very broken between parents and children for it to happen that the child becomes a victim of trafficking. So, in children's cases, a huge amount of social work and outreach work is required to create some security for the children's future because there is a big risk that they will end up in institutions by the end of their childhood, right by their 18th birthday."*[28]

[23] Interview with a former representative of the Bavarian police, 28 April 2022 (G06).
[24] Interview with a Greek investigative judge, 5 April 2022 (J02).
[25] Interview with a representative of a Greek LEA, 4 April 2022 (G08).
[26] Interview with a representative of the Bavarian Ministry of Education, 11 April 2022 (G03).
[27] Interview with a representative of German civil society, a lawyer, 30 March 2022 (C03).
[28] Interview with a representative of Bulgarian civil society, 25 March 2022 (C07).

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> *"The challenge is to work with the families because these children, when they return to the country, are usually placed in a social service, a crisis centre to be able to provide crisis intervention support and of course this is a temporary measure."*[29]

A Greek respondent shared that "the main challenge is the protection of minors/children THB victims who are living in **Roma settlements**. Most often Roma minors are not willing to protect themselves from exploitation, they are not cooperating (even though it is not mandatory for the identification). They don't accept their resettlement and removal from their exploiters who many times can be their family members."[30]

3.2 Gaps and challenges in the investigation and prosecution process

All key EU documents and recommendations on combating THB stress the importance of a victim-centred approach in investigating and prosecuting the crime, including the endeavour to rely less on victim testimony and more on parallel or financial investigation when building one's case in order to avoid revictimization. However, most respondents in the current study with LEA or prosecutorial background agreed that the **unwillingness to testify** of the victim may be the most serious challenge in their work.

> *"From experience I can say that a low willingness to testify on the part of victims often makes investigations very difficult. This sometimes leads to a lack of sufficient evidence while this is especially often the case in very long durations of investigations and court proceedings. Sometimes the willingness to testify decreases in the course of an investigation. I think the most common reasons are a lack of trust, pressure from the perpetrators or that people simply don't want to talk about it, but just want to suppress the incidents."*[31]

A Bulgarian police officer specialising on THB said that if they did not question the victim, they cannot reach the whole objective truth: "The victim is the **main [source of] evidence**, if she denies [what happened], it is very difficult to prove that this is the case. It is good for the trial to hear the victim because she can give information about the process. She's the only one who can reveal the whole scheme."[32]

> *"A… difficulty is that I need the testimony of the women, because THB is an area where nothing works without personal evidence. Compared to [drug related crimes], we have a much harder time in this area… As a rule, I need the statements again in court, that is maybe a year later, then the question is where is the woman then and to what extent is she being argumentatively and emotionally destroyed by the lawyers. I have experienced very bad examples and that is often the reason why there are no verdicts or that the verdicts are very narrow and do not do justice to the case."*[33]

[29] Interview with representatives of Bulgaria's Agency for Social Assistance, 29 march 2022 (G11).
[30] Interview with a representative of a Greek LEA, 4 April 2022 (G08).
[31] Interview with a representative of a German LEA, 4 April 2022 (G02).
[32] Interview with a representative of a Bulgarian LEA, 31 March 2022, (G10).
[33] Interview with a former representative of the Bavarian police, 28 April 2022 (G06).

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*"Witnesses often do not testify or **do not testify truthfully**, without a good testimony of the aggrieved party (in the preliminary proceedings and in the main trial), a conviction can usually not be achieved."*[34]

*"Minimal punishment or even impunity are the results of lack of reliable evidence and often because of **reversal of victims' testimonies** given at pre-trial investigations or their non-admissibility. Victims often flee before trial takes place and cannot be found to be re-examined. This results in incomplete testimonies during pre-trial cannot secure a conviction sometimes and cannot be complemented as victims cannot be found. Victims may also be intimidated at the meantime and forced to change their testimonies."*[35]

Some respondents mentioned that the right **approach to the victim** may sometimes be missing.

"However, the expected result is not sufficient if we are not able as a police force to offer an alternative to the victim's life. We want him to be able to change his life if he wishes in such a psychological, economic and social way that he can feel strong and not fall again due to vulnerability in nets of exploiters."[36]

"I do not believe that the police has formalised procedures to deal with their protection during the investigation stage. Also, the psychologists we use are necessarily trained or experienced in dealing with victims of crime."[37]

*"Securing **proper legal representation** of victims and their protection when proceedings are ongoing needs further reinforcement."*[38]

*"We, to secure our result in the form of a conviction, have to **gain the trust** of these victims, and we as people who work know how fragile it is and how easily it is lost. We identify the case, we start working, and if we don't have the other support [from the victim], we're already losing the case."*[39]

Legal hurdles, collection of evidence and time span of the trial were also mentioned as problems in the investigation and prosecution phase.

"The legal framework is not coherent and confusing, the provisions contain numerous references and multiple qualifications, some of which overlap."[40]

"It starts with the legal situation. It is very difficult to understand… If you look at the relevant paragraphs. An outsider doesn't know anyway, and those who work with the matter often don't have the time or the muse to specialise in the legal situation… The process of making a request for covert action and getting a warrant. That's the hardest thing I think where most of them have problems because they often have secondary tasks and they can't just

[34] Interview with a German prosecutor, 28 March 2022, (J01).
[35] Interview with a Greek investigative judge, 5 April 2022 (J02).
[36] Interview with a representative of a Greek LEA, 6 April 2022 (G09).
[37] Interview with a Greek investigative judge, 5 April 2022 (J02).
[38] Interview with a Greek investigative judge, 5 April 2022 (J02).
[39] Interview with a Bulgarian prosecutor, 31 March 2022, (J04).
[40] Interview with a German prosecutor, 28 March 2022, (J01).

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specialise in that area. It is often difficult to have such a strong case that I can obtain a search warrant, for telephone surveillance, for observation or undercover investigators and so on and so forth. I need the corresponding strong case and, I think, that is the biggest and the first big hurdle, that I get a criminal procedural situation and can't convince the public prosecutor and the investigating judge that the corresponding decisions [be] issued."[41]

"The legal framework for trafficking in human beings is quite complex, because it is an offence contained in different pieces of legislation with different values. In the penal code it is as you can understand the prosecution and the criminal part, in our immigration law there are some things for the residence permit of victims for protection."[42]

"The legal changes effected in 2019 led to a more relaxed legal framework as regards THB. Less severe penalties were provided while other crimes such as pimping and exploitation of sexual workers were abolished. These changes led to impunity for numerous cases. Pimping as a crime was used as a safety net for prosecution and THB since evidential difficulties and other obstacles used to lead to change of charges from THB to pimping to secure a conviction and avoid impunity. This was not possible after the changes of 2019 and many perps were acquitted. Recently only this was rectified and the crime of pimping and exploitation of sexual workers were reinstated."[43]

"In my opinion main challenge is the time that passes before the court procedure. Sometimes victims have been repatriated or have been relocated in another country and it might be difficult to be back for the court procedure."[44]

New forms of THB have presented difficulties for some stakeholders: "What we've seen in recent years... is a development of this crime, there are now some forms of trafficking that we're having a harder time classifying as traditional forms of trafficking. We have such an investigation going on at the moment involving sham marriages; we are definitely having difficulties there... Some of our colleagues have difficulty in accurately qualifying this act within the system of the offences of trafficking."[45] "Another gap [is] that forced begging, for some reason that cannot be understood, has two forms in our criminal code, one is criminal, the other is misdemeanour. As a result, children who are found to be begging by force and for the benefit of their parents often go in the wrong form of begging with other consequences different for the parents."[46]

One specific gap which was identified by LEAs and prosecutors from all three countries in focus pertains to **parallel investigations** and more specifically **financial investigations**, as well as **confiscation of assets**. Parallel investigations and the "follow the money" approach can significantly lower the burden on the victims and their testimony for a successful outcome of the trial and their importance is highlighted in all major EU documents.

[41] Interview with a former representative of the Bavarian police, 28 April 2022 (G06).
[42] Interview with a representative of Greek civil society (C06).
[43] Interview with a Greek investigative judge, 5 April 2022 (J02).
[44] Interview with a representative of a Greek LEA, 4 April 2022 (G08).
[45] Interview with a Bulgarian prosecutor, 31 March 2022, (J04).
[46] Interview with a representative of Greek civil society (C04).

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"Here are the most serious deficits, whatever we say, the biggest problem is exactly in these things with financial investigations and seizures of assets acquired through crime, let's say valuables and material assets."[47]

"I am always asking in how many preliminary proceedings measures have been taken to seize assets? And that is very low every year. The issue of asset confiscation again involves extreme legal challenges."[48]

One Bulgarian prosecutor shared about a serious gap in using **new information and communication technologies** in investigation: "We are hopelessly lagging behind here because, if we are to be honest, the capacity to carry out such effective investigations is only here, in Sofia, in the GCDOP. There is no such capacity locally, there is no understanding, because it is very important for the police to have local structures that are specialised in this area and that can carry out operational work... And we in the prosecutor's office are lagging behind in this direction too, we are going, let me not say a strong word like 20 years, but we are going 10 years behind some countries. After all [these methods help] to identify more victims and more criminal activity, and if you start tracking the assets and the transactions, because they're already going online, [you're about to be even more effective]."[49]

A German law enforcement officer mentioned difficulties in working with **child victims** of trafficking: "That's a bit of the problem with minors. We try to get them to cooperate and we also offer the best possible psychological support, for example through NGOs, but whether the victims cooperate depends on the individual case. It has to be said, however, that the urgency of dealing with cases in which children and adolescents are victims is usually higher."[50]

3.3 Gaps and challenges in institutional capacity

Interviewees from all three countries of focus pointed to challenges linked to the institutional capacity of stakeholders directly or indirectly involved with addressing human trafficking. These include **insufficient or overwhelmed personnel, sizeable staff turnover, low pay and lack of government funding for the operations of institutions** on a daily basis. The personnel referred to comprises a variety of profiles: police, prosecutors, judges, officials at anti-trafficking coordinating bodies, social workers, teachers, inspectors of brothels and interpreters.

"It is often very personnel-intensive, that I have the necessary manpower to carry through the proceedings, because with one person alone who perhaps has five additional tasks, that will not happen successfully, then failure is pre-programmed."[51]

[47] Interview with a Bulgarian prosecutor, 31 March 2022, (J04).
[48] Interview with a representative of a German LEA, 25 April 2022 (G05).
[49] Interview with a Bulgarian prosecutor, 31 March 2022, (J04).
[50] Interview with a representative of a German LEA, 25 April 2022 (G05).
[51] Interview with a former representative of the Bavarian police, 28 April 2022 (G06).

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"The personnel capacities are insufficient, there is a lack of the necessary 'control pressure on the street' to be able to act effectively against gangs of pimps, but there are also insufficient posts in the public prosecutors' offices. Interrogations by the public prosecutor, presence at large-scale searches or arrests are only possible in exceptional cases. As a result, the clearance rate remains low and there is a high number of unreported cases."[52]

"In Berlin, there were 400 to 500 prostitution businesses before the pandemic. There are only a handful of social institutions that do outreach work in brothels. Therefore, only a very small part of the brothels is reached. In most brothels, not even one organisation ever shows up."[53]

"Justice and courts are understaffed, underfunded and poorly equipped."[54]

"It requires a huge capacity and a huge knowledge by social workers, who must be adequately paid. The social system is sinking further and further because with these low salaries they can only employ low skilled staff. They have a high turnover or they employ young, enthusiastic people who after the third year cannot bear it anymore, because they are not professional, they burn out and leave."[55] *"There is a high turnover in the Social Assistance Agency because the work is very hard and difficult and young people especially do not last, they stay a year and leave."*[56]

"At the moment… as far as I can see the whole staff of the [National Commission for Combating Trafficking in Human Beings] has been changed. We do not have communication with the Commission across the country, and I say that quite responsibly, which I define as a problem."[57]

Lack of **infrastructure, operational capacity and sustainable funding** is mentioned as a serious drawback, specifically in Bulgaria.

"This is another problem, purely structural and functional, that the Commission itself, on the one hand, coordinates the referral mechanism, and coordinates a large part, not to say almost all, of the activities that are set out in the National Programme, which reflects, of course, the National Strategy for Combating Trafficking in Human Beings. At the same time, we are reporting under all the instruments and international instruments to which our country is a party... In my opinion, the state does not allocate sufficient funds for the maintenance of services for victims of trafficking, as well as for all other activities related to prevention and raising the capacity of specialists working on the subject."[58]

"We have a terrible, serious, general problem with data collection and processing."[59]

[52] Interview with a German prosecutor, 28 March 2022, (J01).
[53] Interview with a representative of German civil society, 31 March 2022 (C01).
[54] Interview with a Greek investigative judge, 5 April 2022 (J02).
[55] Interview with a representative of Bulgarian civil society, 25 March 2022 (C07).
[56] Interview with representatives of Bulgaria's Agency for Social Assistance, 29 march 2022 (G11).
[57] Interview with a Bulgarian prosecutor, 31 March 2022, (J04).
[58] Interview with representatives of Bulgaria's National Commission for Combating Trafficking in Human Beings, 23 March 2022 (G13).
[59] Interview with representatives of Bulgaria's National Commission for Combating Trafficking in Human Beings, 23 March 2022 (G13).

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"Regarding the crisis centres... there are very few of them on the territory of the country... Now mothers with children and trafficked women themselves are accommodated in the crisis centres. And if men come, they just, we cannot mix these groups. There are no specialised services for men."[60]

Stakeholders in Germany and Bulgaria mentioned the acute need of interpreters in the work with foreign victims of trafficking,[61] while Greek interviewees stressed the lack of technology to handle case-files and remote examination of witnesses.[62]

3.4 Gaps and challenges in inter-agency and trans-border cooperation

Regarding inter-agency cooperation in combating THB, most of the interviewees were able to share positive examples of interaction with other stakeholders, specific ones or in general. However, there were also gaps and challenges identified. One of the criticisms relates to the **absence of structured, formalised mechanisms** of interaction or, even when these are existent, to their inefficient functioning.

"Cooperation within Germany is sometimes very unstructured, and that is the greatest difficulty."[63] *"There are no official structures for the cooperation, so you need to network individually and you also you need to know, who you can and should cooperate with... Let's take the NGOs as an example, there has been a cooperation agreement between the Bavarian police and some NGOs for about 20 years. There are already a few standards laid down on how to behave, how to work together, but as always in life, let's say the practice has to fill it in."*[64]

"In addition to the good practice that can be applied in cases and cross-sectoral cooperation, it is necessary to have a specific memorandum of actions between the parties involved."[65]

"There is a lack of close cooperation between judicial authorities, on the one hand, and other state authorities (i.e. health authorities, social services etc.), on the other hand."[66]

"In my opinion, one of the main challenges is that the institutions that are part of the National Commission for Combating Trafficking in Human Beings do not perceive themselves as such, that is, they stand somewhere on the side, including in the coordination of the National Mechanism for Referral and Support of Victims. But often colleagues who work on alerts [about potential victims] are faced with this very challenge - to activate the coordination mechanism and therefore to achieve an easier coordination of the alerts in question... It is

[60] Interview with representatives of Bulgaria's Agency for Social Assistance, 29 march 2022 (G11).
[61] Interview with a representative of a German customs office, unit for illicit work and exploitation, 6 April 2022 (G01); Interview with a representative of Bulgarian civil society, 25 March 2022 (C07).
[62] Interview with a Greek investigative judge, 5 April 2022 (J02); Interview with a representative of the Greek judiciary, 13 April 2022 (J03).
[63] Interview with a representative of a German customs office, unit for illicit work and exploitation, 6 April 2022 (G01).
[64] Interview with a former representative of the Bavarian police, 28 April 2022 (G06).
[65] Interview with a representative of a Greek LEA, 6 April 2022 (G09).
[66] Interview with a Greek investigative judge, 5 April 2022 (J02).

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difficult to get feedback sometimes on specific cases when it comes to data related to alerts and criminal proceedings."[67]

Somewhat paradoxically, other stakeholders called for more **personalised, informal interactions** among institutions for the sake of efficiency: "Better cooperation with the social workers in the shelters and the integration managers would be helpful with regard to identification. Better cooperation with the district offices would be helpful with regard to transfers/ reallocations to shelters… Cooperation with some lawyers and the judges of the administrative courts is very difficult."[68] "If I have the feeling as a teacher that something exceeds my abilities or my area of responsibility, I naturally need interdisciplinary cooperation very much. But it's very difficult to say who to cooperate with besides the police and youth welfare offices."[69]

This was also shared about international cooperation: "Rather, the problem is the **contact points**. When coordinating, let's say the victim is from abroad, but the idea is to return to Bulgaria. We mainly rely on the embassies in the countries, plus the NGOs that are in the respective country. Somehow, I rather miss that point of contact, to know where to call on the other side."[70]

"When it comes to the operational level, I think that in any area we can say that it is still very much dependent on the knowledge, the desire and the commitment of the individual employee. That is to say, we cannot say that we have excellent cooperation with [individual] countries, no, it is actually dependent on the people and the officers, and I think this is also shared by colleagues who work on police cooperation."[71]

"There is a big gap between the refugee and asylum system and the welfare system... the victim referral thing between countries especially has become terribly formalised, terribly bureaucratised, which I think leads to fewer [victims] coming back here."[72]

Other challenges in international cooperation involve **slowness or sometimes lack of communication**.

"The institutionalised channels, Europol, etc., despite their efficiency due to bureaucracy, often delay the response… [What would help is] directly institutionalised communication channels, even as a simple list of service emails of those services dealing with human trafficking. These channels will not, of course, circumvent the role of Europol, for example, but will eventually strengthen it, since the collection of information at an initial level will better consolidate a case before reference is made to a common case in Europol."[73]

[67] Interview with representatives of Bulgaria's National Commission for Combating Trafficking in Human Beings, 23 March 2022 (G13).
[68] Interview with a representative of German civil society, 6 April 2022 (C02).
[69] Interview with a representative of the Bavarian Ministry of Education, 11 April 2022 (G03).
[70] Interview with representatives of Bulgaria's National Commission for Combating Trafficking in Human Beings, 23 March 2022 (G13).
[71] Interview with a representative of Bulgarian civil society, 25 March 2022 (C09).
[72] Interview with a representative of Bulgarian civil society, 25 March 2022 (C07).
[73] Interview with a representative of a Greek LEA, 6 April 2022 (G09).

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A representative of Bulgaria's anti-trafficking commission, which acts as a National Rapporteur or Equivalent Mechanism (NREM) within the NREM network under the European Commission's Anti-trafficking Coordinator, shared that there are rarely bilateral, practical exchanges with other Member States' NREMs, apart from the regular multilateral meetings in Brussels.[74] Some respondents pointed to specific Member States with which operational LEA cooperation was particularly problematic.[75] One respondent from Greece said LEAs' **regional branches** may not be too familiar with international cooperation as such.[76]

> *"Bulgarian institutions have no time to react when an alert is sent from abroad. I.e. the problem is that foreign institutions send very late information about the victims who should be returned."*[77]

Data exchange among institutions is identified as a hurdle, too, as is the **lack of trust** between government and non-government actors, also related to it.

> *"There is no data exchange, so that the police responsible for patrols and controls have no knowledge of who has registered and what the situation was at the time of registration (e.g. companion? condition of the woman?)."*[78]

> *"We don't have detailed information about the victim's medical condition... for individuals with mental, intellectual disabilities, or dementia, we have no way of knowing where to refer them. And the Ministry of Health is not cooperating either."*[79]

> *"The main challenges are the trust between the relative actors and the willingness to share information with others… Sometimes LEAs may be afraid that the sharing of information can jeopardise their case."*[80]

> *"The NGOs are being pushed out of the process of direct support for the victims and we don't have the opportunity, to do what we've always done, to look for new problems, to solve them in new ways, to apply new things… This is a bit worrying and this problem is not only in Bulgaria... we call it "the shrinking space", the narrowing space for NGOs in this field."*[81]

> *"Very often there is a problem in terms of the civil sector to build some trust in the institutions to make sure that the victims will be adequately supported and addressed. NGOs very often underestimate the function of the institutions and prefer to get in touch with civil sector representatives in the other country."*[82]

[74] Interview with representatives of Bulgaria's National Commission for Combating Trafficking in Human Beings, 23 March 2022 (G13).
[75] Transcript from a conference presentation by a representative of German LEA, 13 October 2020 (G07); Interview with a representative of Bulgarian civil society, 25 March 2022 (C09).
[76] Interview with a representative of a Greek LEA, 4 April 2022 (G08).
[77] Interview with a representative of a Bulgarian LEA, 31 March 2022, (G10).
[78] Interview with a German prosecutor, 28 March 2022, (J01).
[79] Interview with representatives of Bulgaria's Agency for Social Assistance, 29 march 2022 (G11).
[80] Interview with a representative of a Greek LEA, 4 April 2022 (G08).
[81] Interview with a representative of Bulgarian civil society, 25 March 2022 (C07).
[82] Interview with representatives of Bulgaria's National Commission for Combating Trafficking in Human Beings, 23 March 2022 (G13).

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Most actors agree that inter-agency and cross-border cooperation when handling **children victims of trafficking and CSE** is important and these victims require a careful approach.

> *"In the case of children, our actions must be much more rapid and specific. Stakeholders, whether police, prosecutors, hospitals and social bodies must operate and find solutions if necessary even beyond their usual limits (always in accordance with pre-agreed memoranda) to identify, rescue and examine them to the point of protection in a way that protects the best interests of the child."*[83]

> *"I believe the main shortcoming lies in lack of knowledge and cooperation between judicial authorities and those support mechanisms [for children]… With NGOs we don't cooperate much as we are rarely aware of their role and what they can do… But more should be done to foster this cooperation… I believe that cooperation with other authorities such as city council and services of the health sector should be improved in this regard as these actors can help with treating victims, providing them shelter, etc."*[84]

> *"Good coordination between all stakeholders and institutions is essential. Both institutions and children and their parents themselves should also be involved at every stage in their support and protection."*[85]

3.5 Challenges related to novel phenomena in combating trafficking in human beings

The novel challenges identified by interviewees can be grouped as general, linked to the internet and new technologies, COVID-19-linked and those related to refugees from the war in Ukraine. As regards general trends, a German respondent dealing with labour exploitation said that "it seems that the nationalities of the victims are shifting more and more **towards the East** (a phenomenon that has been [observed] for years). There are more and more Ukrainians, Belarusians and this already before the outbreak of the war, especially in the construction sector, while it seems that the victims used to come from "closer" countries, such as Poland. In part, the victims are now also increasingly coming from Vietnam."[86] A Greek interviewee shared that "In the last years there was an **increase in women** immigrants or refugees who were victims of THB abroad, usually Turkey."[87]

Interlocutors from all three countries of focus agree that the **internet** and **new technologies** present serious challenges for practitioners.

> *"The migration to the internet is clear, so you can already see that. This increased in the wake of COVID-19, but was also the trend before. The internet is booming more and more...*

[83] Interview with a representative of a Greek LEA, 6 April 2022 (G09).
[84] Interview with a Greek investigative judge, 5 April 2022 (J02).
[85] Interview with representatives of Bulgaria's Agency for Social Assistance, 29 march 2022 (G11).
[86] Interview with a representative of a German customs office, unit for illicit work and exploitation, 6 April 2022 (G01).
[87] Interview with a representative of a Greek LEA, 4 April 2022 (G08).

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I think it's simply because the perpetrators have now also recognised the advantages… The internet makes it difficult for us to get to the people in the background. We only have the victim on the spot, or where we know or suspect that she is a victim, because we don't have the mobile phone with the number where the ad is placed, where we already know that she doesn't make contact, there is someone in the background and the women are only ever in one place for two or three days, then they are sent on, simply to deliberately disguise the route. So the victims can hardly make contact. That makes it difficult for us again. Who are witnesses, who has travelled with her and are there perhaps other victims of trafficking who can be helped?"[88]

"Traffickers start exploiting victims online with specially rented rooms in front of cameras, if we are talking about sexual exploitation. And to some extent, but increasingly, attention is being paid to precisely this control via the Internet. That is to say, not only is the involvement taking place through the use of various information and communication technologies, but the exploitation itself is taking place there."[89]

A Greek respondent said that "social media and the use of internet can jeopardise the protection of a THB victim."[90] "The internet can of course expose the victim further. Especially, cases which attract media attention, there the victims are exposed. And there no legal means to stop that from happening unfortunately."[91]

According to a Bulgarian civil society representative, "There is much to be desired in Bulgaria, along the lines of investigation… The Internet presents a serious challenge, it also creates opportunities, of course, to find evidence that is left on the Internet, to track it. The question is whether we have that capacity and that expertise."[92]

A German LEA representative shared: "What is increasingly becoming a problem here is that the headquarters of sites like kaufmich.com are partly in Hong Kong or other places outside the EU. In other words, they have been deliberately relocated… And that makes it difficult to send an official request for legal assistance to get information if you need evidence that can be used in court."[93]

The **COVID-19 pandemic** presents another group of novel challenges both in terms of investigation/prosecution and victim support. As a result of the pandemic, cross-border trafficking has decreased, as it has become more difficult for traffickers to move victims from countries of origin to countries where they are exploited;[94] however, this has led to a sharp increase in domestic trafficking.[95]

[88] Interview with a representative of a German LEA, 25 April 2022 (G05).
[89] Interview with representatives of Bulgaria's National Commission for Combating Trafficking in Human Beings, 23 March 2022 (G13).
[90] Interview with a representative of a Greek LEA, 4 April 2022 (G08).
[91] Interview with a Greek investigative judge, 5 April 2022 (J02).
[92] Interview with a representative of Bulgarian civil society, 25 March 2022 (C09).
[93] Interview with a representative of a German LEA, 25 April 2022 (G05).
[94] Interview with a representative of German civil society, 6 April 2022 (C02).
[95] Interview with a Bulgarian prosecutor, 31 March 2022, (J04).

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*"It goes without saying that when there are restrictive measures, this restricts the movement of the victims themselves and therefore their **access to services**, thus **facilitating their control** by the exploiters."*[96]

*"During the pandemic situation and especially the lockdowns, prostitution was practiced through internet by arranging sexual appointments in hotel apartments and Airbnb rooms. Thus, there was an increase in **hidden prostitution**… This might have had negative effect on the detection and **identification** of THB victims."*[97]

*"[In Germany,] brothels were closed during the pandemic… **Identification** just became a bit more difficult because there were no more **controls**." "Many women have continued to work in hotels or on the streets… in order to continue to earn income. In line with this, the number of incoming **offences for the practice of prohibited prostitution** rose sharply last year."*[98] *"After the first lockdown, two things became clear: the women who are organised by pimps and traffickers in prostitution were quickly taken to their countries of origin. And it has become clear that there are hardly any **exit and help** systems. And in the implementation of the Infection Protection Act in state regulations, the focus was on punishing the prostitutes in the old manner. This made those working in prostitution illegal instead of focusing on demand (clients/sex buyers)."*[99]

As regards prosecution, one effect of COVID-19 was that **trials were delayed or declined** in numbers: "The pandemic led to many delays as criminal trials could not be conducted remotely and needed the physical presence of defendants, lawyers etc. A great stock of cases was created. Proceedings were delayed to the detriment of victims as the speed of THB trials is of the essence."[100] "According to statistics, traffic cases have dropped sharply. Bulgaria was at the forefront of the countries, at European level, where there were still convictions, successful cases. Now, purely statistically, we are way down in the number of trafficking cases, because they are more difficult to investigate and the victims are exploited locally, particularly in terms of sexual exploitation."[101]

Many respondents expressed concerns about the **war in Ukraine** and the resulting risks of trafficking for the refugees fleeing the conflict zone. According to a Bulgarian interlocutor, If the war is prolonged and the number of migrants increases, it will exacerbate the problem of human trafficking.[102] "It is only probable that [THB cases in Germany] will increase due to the refugee crisis. We are already registering more suspected cases."[103]

[96] Interview with a representative of Greek civil society (C04).
[97] Interview with a representative of a Greek LEA, 4 April 2022 (G08).
[98] Interview with a German prosecutor, 28 March 2022, (J01).
[99] Interview with a representative of German civil society, 31 March 2022 (C01).
[100] Interview with a Greek investigative judge, 5 April 2022 (J02).
[101] Interview with a Bulgarian prosecutor, 31 March 2022, (J04).
[102] Interview with a representative of a Bulgarian LEA, 31 March 2022, (G10).
[103] Interview with a representative of a German LEA, 4 April 2022 (G02).

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The main points of concern, specifically in Bulgaria, have been the **vulnerability** of Ukrainian refugees to becoming victims of trafficking and the **capacity** of local institutions to handle the crisis.

> *"We see a flow of people, mostly women, not infrequently children, who are extremely vulnerable to all forms of exploitation. [Members of our international network] already have cases of refugees from Ukraine who are also trafficked."*[104]

> *"We have a serious problem with unaccompanied children and children who are accompanied by random passers-by. They are extremely vulnerable to trafficking and exploitation, trafficking for sexual exploitation. Ukrainian organisations have already started to report that they suspect sexual exploitation."*[105]

> *"At the moment there is practically no control over the people who enter the country. Since it is mostly women and children who are entering, they are by definition at risk of trafficking. There are many people coming in, and there is no clear system of monitoring, of evaluation. There can be all sorts of problems with* ***identification****."*[106]

> *"There is a question to what extent we have sufficient capacity to also* ***accommodate*** *these people if it comes to the point where a large number of victims of trafficking are identified."*[107]

> *"Unfortunately, we are not fully prepared for this change. I do not know if anyone predicted such a scenario, but suddenly it will actually turn out that Bulgaria is no longer only a country of origin, but also a transit and destination country for victims of trafficking. Do we have the* ***mechanisms*** *for* ***prevention****? Do we have the mechanisms to* ***train specialists*** *so that they can recognise cases of trafficking at all registration centres? Do we have the necessary* ***infrastructure*** *to cater for victims?"*[108]

One Bulgarian respondent described a new form of exploitation which was allegedly detected at several places already: shelter in exchange for sexual services.[109] Another respondent, a prosecutor, mentioned a potential risk linked to organised crime: "Another problem may follow. [When the war is over] men and relatives [of those who are already here] may start coming. And there is serious organised crime in Ukraine... There will be a clash between Bulgarian organised crime groups and Ukrainian ones, who will want to share the market, including the human trafficking market. All the mentioned people will be at a terrible risk, including of becoming victims on Bulgarian territory."[110]

Interviewees advise early prevention efforts in an understandable language: "Ukrainian refugees must be approached as early as when they are granted the temporary residence status. They should be told what the risks are and what they have to watch

[104] Interview with a representative of an international organisation's Bulgarian branch, 24 March 2022 (C08).
[105] Interview with a representative of Bulgarian civil society, 25 March 2022 (C09).
[106] Interview with a Bulgarian prosecutor, 31 March 2022, (J04).
[107] Interview with representatives of Bulgaria's National Commission for Combating Trafficking in Human Beings, 23 March 2022 (G13).
[108] Interview with a representative of Bulgarian civil society, 25 March 2022 (C09).
[109] Interview with a representative of Bulgarian civil society, 25 March 2022 (C07).
[110] Interview with a Bulgarian prosecutor, 31 March 2022, (J04).

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out for, as they are mostly women with children. Because afterwards, when they are settled in hotels and houses, it will be already too late."[111] "All the prevention we have done so far only for Bulgarian, we should do it in Ukrainian... and make it all very accessible online. Because people don't go to the institutions to ask anymore, they click on their phones and from there they find out what's going on."[112]

3.6 Good practices to be shared in the training process

Interviewees were asked to or shared spontaneously good practices from their work on trafficking in human beings and child sexual exploitation. These shall be included in the ERADICATING Footprint[113] and discussed in the trainings and simulation.[114]

In the **legal domain**, Bulgarian respondents described the country's legislation as well suited and comprehensive:

> *"The system of human trafficking offences under the Criminal Code is well developed. We know about Articles 159a, 159d... I think that our legal framework is very good, even in certain aspects it is one of the best, at European level. We have the relevant articles that allow us to effectively counter this crime, both the different forms of the executive act and the main types of trafficking, with a view to the purpose of exploitation. We are all aware of this positive aspect of our legislation, namely that, in general, the consent of the victim of trafficking is irrelevant to the qualification of such an act as a criminal offence. I think this is modern, it is good, and it is proven in our contacts with our partners at European level, because in many countries this practical convenience is not there, and if the victim does not give her consent, it is not a relevant act, it is not a crime. We have this, let's call it comfort, as the legislator is flexible enough in this respect."*[115]

> *"Bulgarian legislation is quite comprehensive and at a very high level. Sanctions [on human trafficking] are sufficiently severe."*[116]

> *"As far as the protection of victims is concerned, I think it is regulated by law in Bulgaria. In fact, there is a very high status in terms of the state's commitment to the protection and defence of victims, a coordination mechanism which has been established by a decision of the Council of Ministers. In other words, the state has very strong responsibilities in terms of protection."*[117]

A former German LEA officer described the institute of the investigating judge as positive: "It is very good and important that we have the possibility in Germany to call in an investigating judge. If we want to bring a case to a successful conclusion, then it is actually imperative that I then very quickly present the woman to the investigating judge

[111] Interview with representatives of Bulgaria's Agency for Social Assistance, 29 march 2022 (G11).
[112] Interview with a representative of Bulgarian civil society, 25 March 2022 (C07).
[113] Work Package 3.
[114] Work Package 4.
[115] Interview with a Bulgarian prosecutor, 31 March 2022, (J04).
[116] Interview with a representative of a Bulgarian LEA, 31 March 2022, (G10).
[117] Interview with a representative of Bulgarian civil society, 25 March 2022 (C09).

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and that she repeats her statement there in case she is no longer available at the court hearing. That is only one instrument of the criminal procedure code. Then the investigating judge is summoned as a witness for what the woman told him at that time."[118]

A Bulgarian civil society representative praised the government's application of **European Union legal instruments** vis-à-vis Ukrainian refugees' status: "I think it is very positive what the government has done quite quickly - to have a very quick registration of migrants to get a temporary status that gives them access to the labour market and even to all the other opportunities in society."[119]

Apart from the gaps and challenges in **inter-agency and cross-border cooperation** described above, interviewees shared a variety of good practices in this field. In Germany, exchange of information and informal contacts, regular meetings and generally establishing mutual trust of LEAs with other actors was mentioned. These include the Foreigners' Registration Office, district administration of the KVR, municipalities, NGOs, internet platforms and brothels.[120]

> *"In Augsburg, we had an agreement with the brothel operators for a long time that they would send in the young women. That we would look at them and talk to them. Then we noticed in one case years ago that within six weeks three women came in and it was always the same man who dropped them off. Then we checked this man and talked to him and it was always the cousin of this woman. That was of course highly suspicious and we put investigation on it."*[121]

> *"We have had good experiences with SOLWODI [an NGO], exemplary, one must say, as one imagines it. It is important that they do their part and of course do not want to take over the investigations. We have always coordinated very well. I would say that over the years we have dealt with 70-90 women together, and the perpetrators have all been convicted for various offences."*[122]

> *"As the central office, I analyse specific advertisements and we also have a tool that was made available to us by the Federal Criminal Police Office, which analyses the pages a little. This way we can filter by age groups, etc. And certain assumptions can be made by the tool on the basis of the advertisements alone: Is the woman available around the clock? What services does she offer?"*[123]

In Germany, a law enforcement officer said that "We tell officers who actually know little about the subject about our experiences and how we were able to recognise such cases or how such cases were designed."[124] In Greece, an investigative judge mentioned the

[118] Interview with a former representative of the Bavarian police, 28 April 2022 (G06).
[119] Interview with a representative of Bulgarian civil society, 25 March 2022 (C07).
[120] Interview with a representative of a German LEA, 4 April 2022 (G02); Interview with a representative of a German LEA, 25 April 2022 (G05).
[121] Interview with a former representative of the Bavarian police, 28 April 2022 (G06).
[122] Interview with a former representative of the Bavarian police, 28 April 2022 (G06).
[123] Interview with a representative of a German LEA, 25 April 2022 (G05).
[124] Interview with a representative of a German LEA, 4 April 2022 (G02).

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good cooperation with LEAs and the judiciary.[125] Bulgaria has a **specific structure**, a Permanent Working Group of experts under its National Commission for Combating Trafficking in Human Beings, which has formalised interaction among all stakeholders in anti-trafficking: "We have a very good cooperation at expert level with all the representatives of the institutions that are part of the permanent working group under the Commission. All of us, together with the representatives of the non-governmental sector, are able to exchange information and seek assistance easily, quickly and in an operational manner."[126]

The **local level** was also highlighted: "I can say that we are working very well at the local level with the Ministry of Interior and with State Agency for National Security. And especially in the area of trafficking, I think we have a very good level of interaction there because more or less the people who are involved have built mutual respect, a partnership which is very valuable and even now we are developing it."[127]

Internationally, good practices include participation in EU-level and regional platforms and in **Joint Investigation Teams** (JITs) under Europol or Eurojust.

> *"Bulgaria participates very actively in various formats of the European Anti-Trafficking Coordinator and in regional networks such as the Southeast European Anti-Trafficking Coordinators. These are very good platforms for cooperation, at the level of exchange of good practices, policies and so on. At the level of operational cooperation in terms of referral, victim care, Bulgaria's consulates abroad play a very important role."*[128]

> *"At a European level, they [LEAs] have built up quite well their practice with these joint investigation teams. Judging by what comes to us by way of the report, they are reporting pretty good results. They have a point of contact in the other country. They have a mechanism to share information, data and evidence more easily."*[129] *"The JITs are a very good mechanism for cooperation. All of them have ended in convictions."*[130]

In regard to **training**, Greek respondents described how they successfully designed a course by combining cross-border expertise with local experience.

> *"[We used] Project Polaris, which is located in the United States; they have their own protocols of interviews, communication via telephone, etc. We have adapted them to the Greek reality. So now it is a combination, from the interviews… and the information we get from the [hot]line, a training has been created… And we have generally tried the training with EASO, or Frontex, who have attended similar trainings and have given us feedback on it."*[131]

[125] Interview with a Greek investigative judge, 5 April 2022 (J02).
[126] Interview with representatives of Bulgaria's National Commission for Combating Trafficking in Human Beings, 23 March 2022 (G13).
[127] Interview with a Bulgarian prosecutor, 31 March 2022, (J04).
[128] Interview with a representative of Bulgarian civil society, 25 March 2022 (C09).
[129] Interview with representatives of Bulgaria's National Commission for Combating Trafficking in Human Beings, 23 March 2022 (G13).
[130] Interview with a representative of a Bulgarian LEA, 31 March 2022, (G10).
[131] Interview with a representative of Greek civil society (C05).

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In terms of good practices and **novel challenges**, one Bulgarian respondent said that her civil society organisation managed to agree with the government the inclusion of questions/ basic indicators for human trafficking in the registration forms of **Ukrainian refugees**. “This is a great breakthrough. It's the first time the state is including trafficking indicator questions in such a clean form. So there is some will here to work on the problem.”[132]

3.7 Training needs

As part of the endorsed methodology,[133] interviewees were specifically asked to identify what training needs they have or perceive other stakeholders to have. In general, all respondents agreed that trainings are necessary and would improve their work and inter-agency and cross-border interactions. The insights shared include suggested structure and approach of the trainings, topics to be covered and target groups of trainees and trainers. The following table summarises the end-users’ responses, divided by category and country of origin of the respondent (for the sake of convenience, given that trainings will be designed contextually in each of the three countries of focus).

Table 2. Suggested training characteristics according to end-user responses.[134]

Characteristics of the trainings	Germany	Greece	Bulgaria
Structure and approach	To include best practices; presentations of each stakeholders’ work; indicators and questions to be asked by first-line officials; to increase knowledge of other actors; facilitate contacts and networking.	To include interview techniques with victims; case studies; must be interactive, explain interaction among stakeholders on a case; must be targeted; empirical rather than theoretical knowledge; to include breaking-the-ice sessions, exercises, crossword puzzles, online activities,	To include general guidelines; create checklists; practically oriented; must be profiled for the specific administration; interdisciplinary, with prosecutors, judges, NGOs.

[132] Interview with a representative of Bulgarian civil society, 25 March 2022 (C09).

[133] Task 2.2.

[134] Interviews G01, G02, G03, G04, G06, G09, G10, G11, G13, J02, J03, J04 C01, C02, C03, C04, C05, C06, C07, C08, C09.

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		videos; mapping of organisations that can help government agencies; practical guide; simulations; foreign language learning programs for police; to increase knowledge of other actors and communication among pros with experience.	
Topics to be covered	Basic knowledge of THB; general understanding of milieu; sensitisation; all forms of THB; identification; modi operandi of perpetrators; approach to victims; trauma and its consequences; psychological processes; nationalities of victims.	Forms of exploitation, incl. labour exploitation, forced criminality, begging; trauma, how to predispose the victim, understand the threat from perps; prejudice against prostitutes, distinction with domestic violence; approach to victims; relationship of trust; identification. protection of victims and difference with support; vulnerabilities; legal side and definition of THB; asylum process and immigration; victims' rights; housing; legal aid; interpretation; psychosocial support; juvenile victims; financial investigation and	Identification; first aid to victims; OSINT for investigators; protection of victims; to focus mostly on sexual but also labour exploitation and begging; support of victims. cultural specifics of migrants; immigration officials to be trained about social services; sensitisation; how to earn the trust of the child; legal aid; legal environment, Law on Anti-THB; National Referral Mechanism; psychological help; financial investigations; money laundering; theoretical part also important; vulnerable groups, children; detection and qualification of

		money laundering; investigation techniques and stages; national and international cooperation; cultural characteristics of target groups; ethnicities and groups, their customs and traditions; transnational dimension; asset recovery.	the crime; indicators. analysis of risk groups; focus on labour exploitation among investigators; international labour exploitation norms and documents; new trends; criminal law and specialisation on trafficking for lawyers; victim-centred investigations.
Target groups for trainees	Cross-sectoral; exchange experiences; security police; investigation police; the “right people” (curious, devoted); public prosecutor's offices; foreigners’ authorities; customs officials; asset recovery officials; social services; reintegration experts.	Cross-sectoral; police; social workers; psychologists; police academies; judges, lawyers and prosecutors; health officials; airport officials; border officers; travel company officials; acquired knowledge should be conveyed to co-workers when back at work; academy of the judiciary; training must be deployed to other regions.	To address personnel turnover, training should be repeated again and again, encompass more people; first-line officials; regional police directorates; social services; immigration officials; regional social services; child services; magistrates; lawyers; police; people working at registration centres for refugees; labour bureaus; regional child protection depts; prosecutors. regional prosecutors; judges; border police; customs officials; volunteers working with Ukrainian refugees; psychologists; receiving families of child victims;

			pedagogical specialists; labour inspectors.
Target groups for trainers	Victim protection organisations; humanitarian organisations; practitioners, not theorists; specialised services; former victims.		Trainers to be acquainted with their target group's work; attract experienced colleagues as trainers.

4 Recommendations for the ERADICATING Footprint and the trainings and simulation

Based on the identified gaps, challenges, good practices and training needs by end-users, the following recommendations can be made:

- The training courses should include at least some theoretical and legal background and basic definitions of THB and CSE, covering all forms of trafficking, as many stakeholders seem to lack the knowledge and expertise to orient themselves in the changing environment.
- However, the main focus should be practical. Trainings should include good practices, shared by the various actors, as well as case studies. The ERADICATING Footprint should include the Use-case scenarios and additional case studies.
- The ERADICATING Footprint and the trainings should be clearly based on the victim-centred, gender-perspective approach. They should include specific elements regarding children and the special approach they require. Various vulnerable groups should be included: refugees, immigrants, minorities.
- The trainings should strive to encompass as many stakeholders as possible. There are two ways to achieve that: 1) Encourage already trained officials to share their knowledge with co-workers (ensuring replication of the expertise and sustainability); 2) Conduct regional trainings to cover regional structures of LEAs and prosecution offices.
- The trainings should be multi-sector and interdisciplinary. Despite the fact that ERADICATNG's main target groups are LEAs and prosecutors, the inclusion of social workers, labour inspectors, NGOs, etc. will ensure exchange of various standpoints, enrichment of experience and creation of new contacts and

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networks. The trainings should also discuss the interoperability of systems or databases for police cooperation.

- The trainers should come from various backgrounds, including experienced officers, independent experts and especially former victims of trafficking.
- The trainings should be designed as interactive (and possibly digital and modular to ensure efficiency and sustainability), with the active participation of target groups, exercises and possibly breakout groups to encourage interaction in a cosier environment.

A suggested structure of a training course for LEAs and prosecutors

Session 1: Opening and introduction of participants

Session 2: What are THB and CSE? International and national definitions. Legal background

Session 3: What is a victim-centred, gender-based approach? How to approach the victim? Victim's rights, legal aid and victim protection

Session 4: Main forms of THB and CSE; modus operandi of perpetrators.

Session 5: Main vulnerable groups in THB and CSE.

Session 6: Investigation methods; parallel investigations – financial investigations and money laundering

Session 7: Using new technologies and the internet in investigating and prosecuting THB and CSE

Session 7: Inter-agency cooperation and cooperation with non-state actors

Session 8: International cooperation within Europol, Eurojust and bilateral cooperation

Session 9: Case studies and exchange of good practices – breakout sessions with a recapitulating plenary

Session 10: Exercises

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5 Appendix

Annex I – Methodology for the "Collection and analysis of end-user requirements"[135]

1. Overview

1.1. Target groups (participants of the interviews)

- LEAs
- Prosecutorial offices
- Labour inspectorates
- NGOs
- Social service providers
- Other officials involved in investigation and prosecution of trafficking offences (e.g. national coordination units, national rapporteurs or equivalent mechanisms)

Not foreseen in GA:

- Border police, Customs
- Experts responsible for Training/Teaching on THB within the abovementioned groups
- Other actors involved in the management of THB cases (e.g. relevant church organisations, refugee organisations)

1.2. Focal Areas (FAs):

A. Identification

B. Protection (From initial contact to after the end of the court case) and Support (Legal, Psychological) for Victims

C. Interdisciplinary and cross-sectoral Cooperation (national and international)

D. Investigational process

E. International Police Cooperation (In joint investigations; in general; networking)

[135] Task 2.2

F. Prosecution and Court Proceeding

G. For Teachers and Trainers on (Management of) THB Cases

2. Procedure

2.1. prior to the interviews

a. Read D2.1 "Report on Use Case Scenarios" in detail: Here you will already find some gaps, challenges and novel areas that could indicate end-user requirements and will be helpful during the interviews

b. In consultation with your respective national LEA/NGO, which is also a member of the consortium, select interview partners from the target groups mentioned above (1.1). At least 6 interviews are to be conducted per country

2.2. for conducting interviews

a. Brief presentation of ERADICATING and its objectives

b. Brief announcement and sharing of legal/ethical documents

c. Clarify in which of the focal areas (FAs) the respective interviewee has expertise and experience in

d. Conduct the interview, designed based on a selection of relevant focal areas and associated questions by only addressing the relevant focal areas

2.3. for Reporting to T2.2 Leader (until April 10th at the latest)

a. Report/Deliver the following for each interview:

- Date of conduction
- Name of participant
- Organisation of the participant
- Consent Form(s)
- Full transcript of the interview in English (Using the structure of the Modular Questionnaire below)

b. Send all the information mentioned above (2.3.a.) to CSD until April 10th at the latest

3. Modular Questionnaire for Interviews

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FA-A: Identification

A1: “What are the main challenges in relation to the identification of victims of trafficking (VoT)? Why are detection and identification difficult?

A2: “Could you identify specific Gaps in the identification of VoT?”

A3: “Any Novel Areas in relation to the identification of VoT?” (New MO? Did the pandemic change anything? Refugee crises? Internet? etc.)

A4: “Could you identify specific Needs (for improvement) in relation to identification of VoT?“

A5: “In your opinion, can training of certain actors help to satisfy these needs, to eliminate the gaps and/or to improve the overall situation?”

A6: “What do you think training should include to meet these needs? What knowledge/skills needs to be imparted?”

A7: “Could cooperation with other actors simplify identification? (with NGOs, LEAs, other authorities, etc.; national and beyond) How?”

A8: “Are there significant differences in terms of identification when children are victims? Which ones? Specific gaps, challenges or novel areas? Is special training needed? How should this differ from training on adult victims?”

A9 ff: Detailed analysis of what has been said before through follow-up questions (if necessary)

A10: “What outcomes and effects should Training regarding the identification of THB have? (e.g. which capacities are to be expanded or facilitated)”

FA-B: Protection of Victims

B1: “What are the main challenges in relation to the Protection and Support of VoT?

B2: “Could you identify specific Gaps in relation to the Protection and Support of VoT?”

B3: “Any Novel Areas in relation to the Protection and Support of VoT?” (New MO? Did the pandemic change anything? Refugee crises? Internet? etc.)

B4: “Could you identify specific Needs (for improvement) in relation to Protection and Support of VoT?“

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B5: “In your opinion, can training of certain actors help to satisfy these needs, to eliminate the gaps and/or to improve the overall situation?”

B6: “What should training include to meet these needs? What knowledge/skills needs to be imparted?”

B7: “Could cooperation with other actors simplify the Protection and Support of VoT? (with NGOs, LEAs, other authorities, etc.; national and beyond) How?”

B8 “Are there significant differences in terms of Protection and Support of VoT when children are victims? Which ones? Specific gaps, challenges or novel areas? Is special training needed? How should this differ from training on adult victims?”

B9 ff: Detailed analysis of what has been said before through follow-up questions (if necessary)

B10: “What outcomes and effects should Training regarding the Protection of Victims of THB have? (e.g. which capacities are to be expanded or facilitated)”

B11: “Are there any relief/support structures/organizations for (children) VoT in your country?

FA-C: Interdisciplinary and cross-sectoral Cooperation

C1: Please describe these actors, apart from your own organisation, with whom you (should/could) cooperate on THB cases (national and beyond). How is this cooperation beneficial for the case management? What advantages could an extended cooperation have? With whom? How? Why?

C2: “What are the main challenges in relation to the interdisciplinary and cross-sectoral cooperation?

C3: “Could you identify any concrete Gaps in relation to the interdisciplinary and cross-sectoral cooperation?”

C4: “Could you identify any Novel Areas in relation to the interdisciplinary and cross-sectoral cooperation?”

C5: “Could you identify specific Needs (for improvement) in relation to interdisciplinary and cross-sectoral cooperation? “

C6: “In your opinion, can training of certain actors help to satisfy these needs, to eliminate the gaps and/or to improve the overall situation?”

C7: “What should training include to meet these needs? What knowledge/skills needs to be imparted?”

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C8: “Is special interdisciplinary and cross-sectoral cooperation needed when children are victims? With what types of organisations? For what purpose? How? Specific gaps, challenges or novel areas? Is special training on that matter needed for members of your organisation?”

C9 ff: Detailed analysis of what has been said before through follow-up questions (if necessary)

C10: “What outcomes and effects should Training regarding interdisciplinary and cross-sectoral cooperation have? (e.g. which capacities are to be expanded or facilitated)”

FA-D: Investigational Process

D1: “What are the main challenges in relation to investigation on THB?

D2: “Could you identify any specific Gaps in relation the investigation on THB?”

D3: “Could you identify any Novel Areas in relation to investigation on THB?” (New MO? Did the pandemic change anything? Refugee crises? Internet? etc.)

D4: “What are the specific Needs (for improvement) in relation to investigations on THB?“

D5: “In your opinion, can training of certain actors help to satisfy these needs, to eliminate the gaps and/or to improve the overall situation?”

D6: “What should raining include to meet these needs? What knowledge/skills needs to be imparted?”

D7: “Could cooperation with other actors simplify successful investigations? (with NGOs, LEAs, other authorities, etc.; national and beyond) How?”

D8: “Are there significant differences in terms of investigation when children are victims? Which ones? Specific gaps, challenges or novel areas? Is special training needed? How should this differ from training on adult victims?”

D9 ff: Detailed analysis of what has been said before through follow-up questions (if necessary)

D10: “What outcomes and effects should training regarding the investigations on THB have? (e.g. which capacities are to be expanded or facilitated)”

FA-E: International Police Cooperation

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E1: “What are the main challenges in relation to international police cooperation?

E2: “Could you identify specific Gaps in relation to international police cooperation”

E3: “Could you point to any Novel Areas in relation to international police cooperation? (New MO? Did the pandemic change anything? Refugee crises? Internet? etc.)”

E4: “What are examples of specific Needs (for improvement) in relation to international police cooperation? “

E5: “In your opinion, can training of certain actors help to satisfy these needs, to eliminate the gaps and/or to improve the overall situation?”

E6: “What should training include to meet these needs? What knowledge/skills needs to be imparted?”

E7: “Are there any special features with regard to international cooperation when children are victims? Which? Does this lead to specific gaps, challenges or novel areas? Is special training on that matter needed for members of your organisation?”

E8 ff: Detailed analysis of what has been said before through follow-up questions (if necessary)

E9: “What outcomes and effects should Training regarding international police cooperation have? (e.g. which capacities are to be expanded or facilitated)”

FA-F: Prosecution and Court Proceeding

F1: “What are the main challenges in relation to prosecution and court proceeding? Why do proceedings on THB often lead to minimal punishment or even impunity?

F2: “Could you identify concrete Gaps in relation to prosecution and court proceeding?”

F3: “Could you point to any Novel Areas in relation to prosecution and court proceeding (New MO? Did the pandemic change anything? Refugee crises? Internet? etc.)?”

F4: “What are concrete Needs (for improvement) in relation to prosecution and court proceeding?”

F5: “In your opinion, can training of certain actors help to satisfy these needs, to eliminate the gaps and/or to improve the overall situation?”

F6: “What should training include to meet these needs? What knowledge/skills needs to be imparted?”

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F7: “Are there any special features with regard prosecution and court proceeding when children are victims? Which? Does this lead to specific gaps, challenges or novel areas? Is special training on that matter needed for members of your organisation?”

F8 ff: Detailed analysis of what has been said before through follow-up questions (if necessary)

F9: “What outcomes and effects should Training regarding prosecution and court proceeding have? (e.g. which capacities are to be expanded or facilitated)”

FA-G: For Trainers/Teachers on THB

G1: “Are there any special needs with regard to your training/teaching on THB? Which topics, aspects and processes need more attention in training?

G2: “Which areas parts/units of your organisations need more and/or specific training? On which topics?”

G3: “How much time is allocated in your organisation for THB trainings? Is it sufficient?”

G4: “Is it possible to conduct training on THB beyond the scheduled curriculum?”

G4: “How can training (simulation exercises) together with staff from other sectors and institutions be beneficial? What shall these trainings provide to support your work? How should they be designed?”

G5: “What information needs to be provided in a guide to improve victim-orientation and protection?”

INTERVIEW CONSENT FORM

- I agree to participate in the interview organized by the [organization], as part of the European project “ERADICATING - Enhancing pRevention AnD multI-agenCy cooperAtion against TraffickING ”.
- I was thoroughly informed about the project and understand the goals it aims to achieve.
- I am free to choose not to answer any of the questions that will be asked and I can withdraw my consent any time. During the discussion, or at the end of it, I can ask the facilitator to modify or remove any of my comments.

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- My name and other personal data collected and processed for the project will not be published or disclosed to anyone who does not belong to the research team.
- The personal data related to me and declared by me will be kept in a file which will be subject to legal processing according to the provisions of the General Regulation for Data Protection (GDPR) 2016/679 and the national laws of [country].
- I will respect the personal information of the other participants and understand that the information provided by me or others must remain confidential.
- The information I will provide will only be used for the “ERADICATING - Enhancing pRevention AnD multI-agenCy cooperAtion against TraffickING” project.
- My participation is voluntary and I am free to leave at any time.
- I agree/disagree [please encircle correct] the interview to be recorded on audio strictly for the purpose of accuracy and the file to be used for the data analysis only.
- I confirm that I am above 18 years old.

For further questions or concerns about this study, please contact the project manager, [PM’s Name and Surname] at [e-mail address].

Participant’s Name and Surname:

Date:

Signature:

Annex II – List of interviews and codes

#	Code	Institution & position	Details
1	G01	A main customs office of the Federal Republic of Germany, unit for illicit work and exploitation	Date of interview: 6 April 2022
2	G02	National Police Force Germany (not federal), unit focused on THB, among other topics	Date of interview: 4 April 2022
3	G03	Bavarian Ministry of Education, Special pedagogue at a school specialised for children and young people with behavioural disorders	Date of interview: 11 April 2022
4	G04	Teacher/Lecturer on criminology related topics including THB in Bavaria. Former criminal police investigator on sexual crimes, crimes related to prostitution and THB, etc.	Date of interview: 21 April 2022
5	G05	BLKA (Bavarian State Office of Criminal Investigation) Central Office for THB	Date of interview: 25 April 2022
6	G06	Former head of K1 in Augsburg, Bavarian police. Several decades of experience in THB investigations. Since retirement (about 2 years ago), expert on THB in parliamentary	Date of interview: 28 April 2022

		enquiries, for political foundations etc.	
7	G07	Chief Criminal Commissioner (Frankfurt am Main)	Transcription from a conference panel held on 13 October 2020.
8	G08	Hellenic Police	Date of interview: 4 April 2022
9	G09	Hellenic Police	Date of interview: 6 April 2022
10	G10	General Directorate “Combating Organised Crime”, MoI, Bulgaria	Date of interview: 31 March 2022
11	G11	Agency for Social Assistance, Ministry of Labour and Social Policy, Bulgaria	Date of interview: 29 March 2022
12	G12	General Labour Inspectorate, Bulgaria	Responses to questionnaire submitted on 15 April 2022
13	G13	National Commission for Combating Trafficking in Human Beings, Bulgaria	Date of interview: 23 March 2022
14	J01	Senior Public Prosecutor Head of Department XVIIb Human Trafficking, Forced Prostitution, Pimping - Munich Public Prosecutor's Office I	Date of interview: 28 March 2022
15	J02	Investigative judge	Date of interview: 5 April 2022
16	J03	Prosecutor	Date of interview: 13 April 2022
17	J04	Prosecutor, Head of the Association of Prosecutors of Bulgaria	Date of interview: 31 March 2022
18	C01	Neustart e.V. (NGO Berlin, Germany) Co-founder and chairman	Date of interview: 31 March 2022

		Active as a street worker for more than 15 years. Speaker and expert, e.g. for the parliamentary group "Prostitution where to?" and for various parties in the German Bundestag	
19	C02	The Justice Project e.V. (Karlsruhe, Germany) Sociologist / Political Scientist	Date of interview: 6 April 2022
20	C03	Lawyer with a focus on criminal law and international affairs. Founder of Ge-STAC, an organisation of trafficked persons for trafficked persons and exploited persons. One of 21 members of ISTAC, the International Survivors of Trafficking Advisory Council of the ODIHR	Date of interview: 30 March 2022
21	CO4	Lawyer, legal adviser to the national reporting mechanism for the protection of victims of trafficking; representative of EKKA, the national centre of social solidarity and staff seconded by the Norwegian Refugee Council	
22	C05	A21, a victim support international NGO, Greek branch	

23	C06	EKKA-EMA, a Greek NGO	
24	C07	Animus Association Foundation, a Bulgarian NGO active in victim support, part of the La Strada network	Date of interview: 25 March 2022
25	C08	International Organisation for Migration, Sofia office	Date of interview: 24 March 2022
26	C09	Dignita Foundation, focusing on THB victims' rights; ex-head of National Anti-Trafficking Commission	Date of interview: 25 March 2022