



Study Guide
for the
Council of Europe

Topic Area:
Combating Human and Organ Trafficking

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1. Welcoming Letter

Honourable Ministers,

It is with great pleasure and excitement that we welcome you to the Council of Europe at Rhodes MRC 2025. As your Board, we are honoured to guide you through this journey, which we are confident will be a stimulating and enriching experience for all of us.

First and foremost, keep in mind that Rhodes MRC is more than just a simulation; it is an opportunity to step into a diplomat's shoes, think critically about global issues, and engage in meaningful dialogues with peers from diverse backgrounds. Over the course of this conference, you will not only debate and negotiate but also develop skills in public speaking, diplomacy, and collaboration –skills that are vital in today's interconnected and ever-changing world.

In this exact environment, the Council of Europe's crucial role is to safeguard democracy, rule of law and human rights, and our topic "Combating Human and Organ Trafficking" appears to be both challenging and relevant. Therefore, during your preparation and the days of the conference, we encourage you to approach this topic with an open mind, a willingness to listen and negotiate, as well as a commitment to addressing the issues under discussion with creative yet feasible ideas.

It goes without saying that the success of our sessions relies on your active participation, thoughtful inputs, and respectful engagement with one another. We are confident that each of you will bring a unique perspective that will enrich our discussions and contribute to an overall satisfactory outcome. Finally, we would like to reassure you that we remain at your disposal for any inquiries, since we opt for making this MUN experience not only memorable but also impactful for each and every one of you.

We are really looking forward to meeting you all and hearing the insights you will bring to our deliberations. And, once again, welcome to the Council of Europe!

Warm regards,

Effrosyni DRISI-BOURA, *Chairperson*

Nikos KAVOURAS, *Secretary-General*

Eirini TSOPANOGLOU, *Deputy Secretary-General*

2. Introduction to the Committee

For the last 75 years, the Council of Europe has been an important international organization promoting democracy, human rights, and the rule of law. This has been implemented by the creation of a single system of legislation under the European Convention on Human Rights (ECHR), binding the countries across Europe. Throughout the years, it has developed over 200 legally binding international treaties, which remain under its umbrella for the promotion and protection of human rights in Europe. Yet, despite lacking legislative powers, the Council sets and monitors European standards via its many institutions.

The establishment of a unified legal framework by the Council has been a milestone in international law and a beacon of human rights protection globally. Its importance lies in the dual purpose it serves; while binding member states to the requisites of human rights protection, it also avails avenues for redress upon violation, thereby strengthening the rule of law.¹

The Committee of Ministers is the institutional centrepiece of the Council, and the latter has achieved considerable success in supervision executed on the basis of 25,000 judgments and decisions from the European Court of Human Rights, thus having a serious impact on the lives of millions of people around the continent. The Committee is comprised either of foreign affairs ministers of the member states or their permanent representatives in Strasbourg, and primarily acts as the decision-making body of the Council. Moreover, the system supervising the execution of ECHR judgments within the Committee of Ministers constitutes an indispensable part in the effort to ensure compliance with the standards of human rights.²

The Council of Europe's Parliamentary Assembly (PACE) is, in essence, a democracy forum in which urgent problems of common interest are debated and reflected upon within its specific committees, showcasing the Council's responsibility in addressing contemporary

¹ Council of Europe. "Who We Are", October 7, 2023. <https://www.coe.int/en/web/about-us/who-we-are>.

² Committee of Ministers. "About the Committee of Ministers", October 7, 2023. <https://www.coe.int/en/web/cm/about-cm>. Parliamentary Assembly", October 7, 2023. <https://www.coe.int/en/web/no-hate-campaign/parliamentary-assembly1>.

challenges. The role of the Parliamentary Assembly as an open space for debate offers the opportunity for issues to be thoroughly examined, thus promoting openness and inclusiveness in the decision-making processes. This democratic structure, then, secures that the Council of Europe remains adaptive and responsive to emerging crises.³

Overall, the Council, with its absolute dedication to democracy, human rights and the rule of law, acts as the mainstay of governance and, in its way, a form of inter-governance in both Europe and the globe. It is the strong legal framework as well as the active development of treaties and implementation mechanisms that aim to lead not only to the maintenance of the democratic acquis, but also to the promotion of the highest standards of human rights and democracy.³

³ Portal. "The Council of Europe: key facts", October 7, 2023.
<https://www.coe.int/en/web/portal/the-council-of-europe-key-facts>.

3. Introduction to the Topic Area

The Council of Europe, through the promotion of active dialogue, cooperation, and sharing of best practices among member states, elicits a consistent and unified approach to thwart human trafficking with a specific focus on organ trafficking. To this end, it has adopted the Convention on Action against Trafficking in Human Beings, 2005, a comprehensive legislative framework designed to protect victims, prosecute traffickers, and prevent trafficking. Moreover, the Group of Experts on Action against Trafficking in Human Beings (GRETA)⁴ monitors the implementation of the Convention and issues country-specific recommendations with a view to strengthening the fight against trafficking. Despite these efforts, the trafficking networks continue to operate with greater sophistication, exploiting legal loopholes, subpar policing, enforcement and repressive measures as well as weak international collaboration, especially when it comes to organ trafficking.

This is particularly urgent in regions of conflict and economic instability, where vulnerable people are being forced to donate organs to meet the global demand. How can the member states strengthen and enforce the existing legal frameworks to ensure compliance with the recommendations of the Council?⁵ Vulnerable populations, including migrants, refugees, and marginalized communities, are especially targeted by traffickers, with women and children at particular risk.

These groups are often coerced into both sexual exploitation and organ trafficking, driven by economic instability and conflict in certain regions. Poor implementation of laws and inconsistent enforcement across member states prevent effective combating of trafficking networks, which operate across borders with relative impunity. This, coupled with a lack of support mechanisms for the victims, especially those of organ trafficking, renders them unable to access necessary medical and psychological treatment. Poverty, inequality, and inadequate legal pathways for migration are just some of the root causes of trafficking, further driving the problem, while global demand for illicit organs exacerbates the issue.

⁴ Greta - action against trafficking in human beings - www.coe.int (no date) Action against Trafficking in Human Beings. Available at: <https://www.coe.int/en/web/anti-human-trafficking/greta>

⁵ "Council of Europe Convention against Trafficking in Human Organs." *Council of Europe Treaty Series* - No. 216, n.d. <https://rm.coe.int/16806dca3a>.

4. Glossary

- **Human Trafficking:** Human Trafficking is the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit. Men, women and children of all ages and from all backgrounds can become victims of this crime, which occurs in every region of the world.
- **Black Market:** The illegal trading of goods that are not allowed to be bought and sold, or that there are not enough of for everyone who wants them
- **Organ Trafficking:** The illegal removal and trade of organs, often involving coercion, deception, or exploitation of vulnerable individuals.
- **Transplant Tourism:** The practice of traveling to another country to buy or receive an organ transplant, often involving illegal or unethical procedures.
- **Vulnerable Populations:** Groups at increased risk of exploitation due to factors such as poverty, displacement, lack of legal status, or social marginalization. This includes migrants, refugees, women, children, and marginalized communities.
- **Sexual Exploitation:** A form of trafficking in which individuals are coerced or deceived into engaging in sex work or other forms of sexual activity for the profit of others.
- **Cannibalism Practices:** A rare and extreme form of exploitation involving the use of human body parts for ritualistic or criminal purposes; mentioned in some trafficking contexts as a form of abuse or black-market trade.
- **Social Media Recruitment:** The use of online platforms to lure and recruit victims into trafficking schemes, often through deceptive job offers or fake relationships.
- **Post-Operative Healthcare:** Medical treatment and support provided after surgery, which is often denied or inaccessible to victims of organ trafficking.

- **Re-victimization:** The repeated exposure of trafficking survivors to trauma or exploitation, often due to inadequate legal protection, lack of social support, or institutional failure.
- **Legal Organ Market:** A proposed regulated system in which organ donation and transplantation are legally managed to meet medical demand and potentially reduce illegal trafficking.
- **Ethical Organ Donation Systems:** Organ donation frameworks that ensure transparency, consent, and fairness, and that operate without exploiting donors.

5. Legal Framework

The Council of Europe has long recognized human trafficking as a grave violation of human rights and human dignity. In response, it has developed a comprehensive legal framework aimed at prevention, protection, and prosecution. This section will explore the key legal conventions, recommendations, and monitoring mechanisms shaping the Council of Europe's coordinated efforts to combat human and organ trafficking.

5.1. The Committee of Ministers

The role and functions of the Committee of Ministers (CM) are described in Chapter IV of the Statute of the Council of Europe (ETS No. 001)⁶

5.2. Council of Europe Conventions

5.2.1. *European Convention on Human Rights (ECHR)*

The European Convention on Human Rights is the first Council of Europe's convention and the cornerstone of all its activities. It was adopted in 1950 and entered into force in 1953. Its ratification is a prerequisite for joining the Organization. Within its crucial provisions, Article 14 for the Prohibition of Discrimination, prohibits discriminatory practices in sports organizations or unequal access to sports facilities for women, minorities, or disabled persons, while Articles 6 concerning the Right to Fair Trial and Article 8 on the Right to Respect Private Life, ensure fairness in sports-related disputes and disciplinary proceedings, and athletes' privacy accordingly.⁷

⁶ Council of Europe, 1949. Statute of the Council of Europe. Strasbourg: Council of Europe. Available at: <https://www.coe.int/en/web/about-us/statute>

⁷ "Council of Europe", European Convention for the Protection of Human Rights and Fundamental Freedoms, as amended by Protocols Nos. 11 and 14, ETS 5, November 4, 1950. <https://www.refworld.org/legal/agreements/coe/1950/en/18688>

5.2.2. Council of Europe Convention on Action against Trafficking in Human Beings (CETS No. 197)

While building on existing international instruments, the Convention goes beyond the minimum standards agreed upon in them and strengthens the protection afforded to victims. The Convention applies to all forms of trafficking, whether national or transnational, whether related to organised crime, and whoever the victim, whether women, men, or children, and whatever the form of exploitation, sexual exploitation, forced labour or services, etc.⁸

5.2.3. Council of Europe Convention on preventing and combating violence against women and domestic violence (CETS No. 210)

The Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence, known as the "Istanbul Convention," is founded on the notion that violence against women is a type of gender-based violence committed against women because they are female. The treaty makes it clear that there can be no true equality between men and women if women face widespread gender-based violence, while state agencies and institutions turn a blind eye.⁹

5.2.4. Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (CETS No. 201)¹⁰

The Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse, also known as "the Lanzarote Convention", requires criminalisation of all kinds of sexual offences against children. It sets out that states in Europe and beyond shall adopt specific legislation and take measures to prevent sexual violence, to protect child victims, and to prosecute perpetrators.

⁸ "Council of Europe Treaty Series - No. 197 Council of Europe Convention on Action against Trafficking in Human Beings *," n.d. <https://rm.coe.int/168008371d>.

⁹ "Council of Europe Treaty Series - No. 210 Council of Europe Convention on preventing and combating violence against women and domestic violence," n.d. <https://rm.coe.int/168008482e>.

¹⁰ "Council of Europe Treaty Series - No. 201 Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse," n.d. <https://rm.coe.int/1680084822>.

5.2.5. Council of Europe Convention against Trafficking in Human Organs (CETS No. 216)¹¹

To address the gaps in legal protection specific to organ trafficking, the Council of Europe introduced a dedicated instrument: the Convention against Trafficking in Human Organs (Santiago de Compostela Convention, 2015). This convention is the first international treaty to criminalize trafficking in human organs per se, whether or not it occurs in the context of human trafficking.

5.3. Council of Europe recommendations and resolutions

5.3.1. Recommendation No. R (91) 11 concerning sexual exploitation, pornography and prostitution of, and trafficking in, children and young adults¹²

This recommendation promotes and encourages programmes aimed at furthering awareness and training for those who have functions involving support and protection of children and young adults in the fields of education, health, social welfare, justice and the police force to enable them to identify cases of sexual exploitation and to take the necessary measures.

5.3.2. Recommendation CM/Rec (2019) 2 - Protecting and Supporting Victims of Trafficking for Sexual Exploitation¹³

The recommendation urges the member States to establish a consistent framework for guardianship for unaccompanied and separated children in migration, assess their legislation, and allocate resources for reforms.

¹¹ Council of Europe Treaty Series - No. 216 Council of Europe Convention against Trafficking in Human Organs, n.d. Available at: <https://www.coe.int/en/web/conventions/full-list?module=treaty-detail&treaty-num=216>

¹² Council of Europe, 1991. Recommendation No. R (91) 11 on sexual exploitation, pornography and prostitution of, and trafficking in, children and young adults. Strasbourg: Council of Europe. Available at: <https://rm.coe.int/16804fe5d0>

¹³ Council of Europe, 2019. Recommendation CM/Rec(2019)2 on integrated national strategies for the protection of children from violence. Strasbourg: Council of Europe. Available at: https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=0900001680931f6b

5.3.3. Resolution 2097 (2016) of the Parliamentary Assembly - Human Trafficking and the Use of the Internet and Social Media by Traffickers

This resolution emphasizes the need for research and data collection on prostitution and trafficking. It should aim to collect nationwide information and be conducted based on Europe-wide harmonised standards to guarantee comparability.

5.4. Group of Experts on Action against Trafficking in Human Beings (GRETA)

The Council of Europe Anti-Trafficking Convention is a monitoring system established to ensure that State Parties comply with the Convention's provisions. It is composed of two pillars: The Group of Experts on Action against Trafficking in Human Beings (GRETA), an independent expert body with 15 members selected for their expertise in the Convention's areas of coverage, and the Committee of the Parties.¹⁴

The Group of Experts on Action against Trafficking in Human Beings (GRETA) is responsible for monitoring the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by the Parties. GRETA meets in plenary sessions three times a year, carries out visits, and draws up and publishes country reports evaluating legislative and other measures taken by Parties to give effect to the provisions of the Convention. Ultimately, it regularly publishes general reports on its activities.¹⁵

5.5. ECRI General Policy Recommendation N°16¹⁶

This recommendation aims to protect irregularly present migrants from discrimination by ensuring access to human rights, including education, healthcare, housing, social security, and labour protection, and implementing effective firewalls to prevent social service providers from sharing personal data.

¹⁴ *Monitoring of the implementation of the Council of Europe anti-trafficking convention - action against trafficking in human beings* - www.coe.int. Available at: <https://www.coe.int/en/web/anti-human-trafficking/austria1>.

¹⁵ "GRETA - Group of Experts on Action Against Trafficking in Human Beings," n.d. <https://www.coe.int/en/web/anti-human-trafficking/greta>.

¹⁶ "ECRI General Policy Recommendation N°16," n.d. <https://www.coe.int/en/web/european-commission-against-racism-and-intolerance/recommendation-no.16>.

6. Main discussion of the Topic

6.1. Vulnerable Populations Targeted by Traffickers

Human trafficking constitutes a severe violation of human rights, disproportionately affecting vulnerable populations such as migrants, refugees, and marginalized communities. These individuals often find themselves in dire situations, having limited access to healthcare, social protection systems, and legal assistance, with the constant threat of detention or deportation further exacerbating their vulnerability. Traffickers tend to target economically disadvantaged individuals or members of ethnic minority groups, exploiting their desperation with false promises of employment, safety, or a better life. Deprived of basic human needs, said individuals are increasingly susceptible to manipulation, coercion, and exploitation for financial gain.

6.1.1. Migrants, Refugees and Marginalized Communities

Contrary to popular belief, human trafficking is not a phenomenon taking place in the shadows, but it thrives in plain sight. Its main root cause is not crime, but inequality, discrimination, and the silent collapse of weak institutions and systems, with migrants, refugees, and marginalized individuals finding themselves at the centre of it.

While "migrant" and "refugee" are sometimes used interchangeably, they refer to fundamentally different realities. Therefore, each category's distinct rights and vulnerabilities must be reviewed separately.

Migrants are people who move across borders for reasons that are not necessarily related to direct persecution. This includes those seeking work, better living conditions, or opportunities unavailable in their home countries¹⁷. Although this movement is often described as voluntary, that term can be misleading. Economic desperation, environmental instability, and political marginalization can make the "choice" to

¹⁷ International Organization for Migration (IOM), 2019. *Glossary on Migration*. Geneva: International Organization for Migration. Available at: <https://publications.iom.int/books/international-migration-law-ndeg34-glossary-migration>

Refugees, by contrast, are people who “owing to well- founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of his nationality and is unable or, owing to such fear, is unwilling to avail himself of the protection of that country; or who, not having a nationality and being outside the country of his former habitual residence as a result of such events, is unable or, owing to such fear, is unwilling to return to it”¹⁸.

They are primarily protected by the 1951 Refugee Convention and its 1967 Protocol, which obliges states to offer them protection. But legal protection on paper doesn't always translate into meaningful safety in practice. In the past decade, we've seen thousands of refugees from countries like Syria, Afghanistan, and Eritrea encounter closed borders, overwhelmed asylum systems, and policies designed more to deter than to protect. This leaves many as prey to traffickers and exploiters.

For someone leaving behind conflict, economic degradation, or persecution, the journey itself is often as dangerous as the situation they're fleeing from. Smugglers, who may start out as facilitators of movement, sometimes morph into traffickers—using debt, deception, or force to push people into exploitative situations¹⁹. Others are trapped upon arrival, caught between harsh immigration enforcement and the need to survive. Women and girls are particularly vulnerable to sexual exploitation²⁰, while men—especially those from South Asia and sub-Saharan Africa—are frequently subjected to forced labour on farms, factories, or construction sites. LGBTQ+ migrants and stateless individuals also face higher rates of abuse and violence due to systemic exclusion and a lack of tailored support.

In 2022, a concerning case involving 14 suspected trafficked African women surfaced from the Samos Closed Controlled Access Centre in Greece. None were formally identified as victims despite obvious signs, such as forced sex work and indications of labour exploitation²¹. Lack of evidence wasn't the issue. It was a lack of coordinated response

¹⁸ United Nations, 1951. *Convention relating to the Status of Refugees*. Geneva: United Nations. Available at: <https://www.unhcr.org/1951-refugee-convention.html>

¹⁹ UNODC, 2021. *Trafficking in Persons & Smuggling of Migrants Module 5: Key Issues – Vulnerability*. United Nations Office on Drugs and Crime. Available at: <https://www.unodc.org/e4j/en/tip-and-som/module-5/key-issues/vulnerability.html>

²⁰ UN Women, 2024. *In Search of Safety - LGBTIQ+ People on the Move*. Available at: <https://www.unwomen.org/en/news-stories/explainer/2024/06/in-search-of-safety-lgbtq-people-on-the-move>

²¹ Farge, E., 2024. *Greece failed to identify sex trafficking victims in migrant centre, UN expert alleges*. Reuters. Available at: <https://www.reuters.com/world/europe/greece-failed-identify-sex-trafficking-victims-migrant-centre-un-expert-alleges-2024-12-02/>

mechanisms, inadequate training, and bureaucratic dysfunction—problems that are neither new nor specific to Greece.

Another compelling example is *Chowdury and Others v. Greece* (2017), in which the European Court of Human Rights ruled against Greece for failing to stop 42 Bangladeshi workers from being forced to work in terrible conditions²². In *Rantsev v. Cyprus and Russia*, the Court found both states liable after a young woman trafficked into sex work died under suspicious circumstances²³. These rulings highlight the recurring failure of national systems to detect and prevent trafficking, even when the signs are glaring. And this isn't just a problem at Europe's periphery. In the UK, migrant domestic workers—many of them women from Southeast Asia or West Africa—have reported conditions akin to modern slavery: no pay, no privacy, and constant surveillance. Yet immigration rules often tie their legal status to their employers, leaving them afraid to report abuse for fear of deportation.

The Council of Europe has invested heavily in tackling trafficking, particularly through its Convention on Action against Trafficking in Human Beings (2005). What makes this convention significant is that it doesn't just criminalize trafficking; it puts the victim at the forefront. Regardless of their nationality or immigration status, every victim is supposed to be entitled to protection, support, and redress. Furthermore, the Council's Action Plan for 2021–2025 focuses on early identification, multi-agency collaboration, and protecting vulnerable people within migration and asylum systems. The European Commission against Racism and Intolerance (ECRI) has emphasized that without access to housing, healthcare, education, and legal aid, any talk of "trafficking prevention" is incomplete.

Yet despite this robust framework, the same challenges keep surfacing. The implementation gap is striking. Monitoring bodies like GRETA (Group of Experts on Action against Trafficking in Human Beings) routinely point out systemic failures—such as inconsistent victim identification procedures, under-resourced shelters, and inadequate training for front-line workers²⁴. GRETA's reports are thorough, but their recommendations are not

²² European Court of Human Rights, 2017. *Chowdury and Others v. Greece*, Application No. 21884/15, Judgment of 30 March 2017. Strasbourg: European Court of Human Rights. Available at: [https://hudoc.echr.coe.int/eng#{%22itemid%22:\[%22002-11581%22\]}](https://hudoc.echr.coe.int/eng#{%22itemid%22:[%22002-11581%22]})

²³ European Court of Human Rights, 2010. *Rantsev v. Cyprus and Russia*, Application No. 25965/04, Judgment of 7 January 2010. Strasbourg: European Court of Human Rights. Available at: [https://hudoc.echr.coe.int/eng#{%22itemid%22:\[%22001-96549%22\]}](https://hudoc.echr.coe.int/eng#{%22itemid%22:[%22001-96549%22]})

²⁴ Council of Europe (2024) *Anti-trafficking group GRETA issues 2023 report*. Available at: <https://www.coe.int/en/web/portal/-/anti-trafficking-group-greta-issues-2023-report>

binding, and political will remains patchy at best. Worse still, some countries actively undermine protection efforts by prioritizing border security over human rights²⁵. There are documented instances—like in Bulgaria—where asylum seekers have been pressured into “voluntary” returns, even when these returns were neither voluntary nor safe. In such environments, trafficking victims are not just neglected—they’re erased²⁶.

Vulnerability to human trafficking is reinforced by deeper social currents that go beyond the law and institutions. Economic marginalization, xenophobia, and racism combine to put some communities in a state of constant precarity. Stateless people, Roma populations, undocumented migrants, and LGBTQ+ asylum seekers are frequently excluded on two levels: first by society, and then by the very services that are supposed to help them²⁷. For fear of being detained or deported, many people completely refrain from reporting abuse. One of the biggest advantages of traffickers is this silence, which is the result of mistrust and fear²⁸. It permits exploitation to go unchecked, particularly in industries that depend on unseen labour. Therefore, trafficking is more than just a crime. It’s the byproduct of systems that devalue certain lives.

Europe’s human rights architecture is one of the most developed in the world. But frameworks, no matter how well-designed, are only as strong as their enforcement. The gap between intention and implementation must be closed—not just through legislation, but through deep institutional reform, proper funding, and inclusive policy-making that midpoints survivors’ voices. Europe cannot credibly defend human rights while trafficking victims remain invisible, unheard, and unprotected. If we want to turn the tide, we must stop seeing migration as a problem to be managed—and start treating it as a human reality that demands empathy, structure, and solidarity.

²⁵ European Council on Refugees and Exiles (2025) *European countries continue to have difficulties in identifying and protecting victims of human trafficking*. Available at: <https://ecre.org/european-countries-continue-to-have-difficulties-in-identifying-and-protecting-victims-of-human-trafficking/>

²⁶ European Council on Refugees and Exiles (2025) *Asylum seekers in Bulgaria subject to violence, abuse and pushbacks*. Available at: <https://ecre.org/asylum-seekers-in-bulgaria-subject-to-violence-abuse-and-push-backs/>

²⁷ Weatherburn, A., (2015) 'The effects of political and socio-economic factors on human trafficking', ResearchGate. Available at: https://www.researchgate.net/publication/284725360_The_effects_of_political_and_socio-economic_factors_on_human_trafficking

²⁸ Canadian Centre to End Human Trafficking (2025) 'Why victims and survivors of human trafficking may choose not to report', *Canadian Centre to End Human Trafficking*. Available at: <https://www.canadiancentretoendhumantrafficking.ca/why-victims-and-survivors-of-human-trafficking-may-choose-not-to-report/>

6.1.2. Women and Children at Particular Risk

Two other highly vulnerable and marginalized categories are those of women and children. The targeting of women and children by traffickers showcases structural imbalances entrenched within European societies in a very evident manner.

Women often face compounded risks rooted in systemic gender inequality, economic dependence, and patriarchal norms that expose them to coercive environments. The prevalence of sexual exploitation among trafficked women reflects not only opportunistic criminality but also institutional failings to prevent gender-based violence and uphold gender-sensitive protections²⁹.

Children, especially those unaccompanied or separated from their families, are likewise highly susceptible to trafficking, most commonly for sexual abuse, forced labour, or coerced criminal activity³⁰. These children frequently fall outside the protection net of state institutions due to legal ambiguity surrounding their status, gaps in child welfare systems, or discriminatory attitudes. In many cases, their invisibility within official registers—combined with institutional fragmentation between migration, justice, and social services—renders them especially easy targets for traffickers. The result is a systematic failure of child protection frameworks, especially during humanitarian crises or large-scale displacement³¹.

Recognizing these risks, the Council of Europe has explicitly incorporated gender- and age-sensitive provisions into its Convention on Action against Trafficking in Human Beings (2005). The Convention obliges states to apply a victim-centred, rights-based approach that prioritizes early identification, appropriate accommodation, legal assistance, and psychological support, with particular emphasis on the needs of women and children. It also mandates safeguards for unaccompanied minors, including the appointment of legal guardians and a best interests-of-the-child determination in all decision-making. Yet, implementation across member states remains inconsistent. Critical services such as trauma-informed counselling, safe housing, and long-term reintegration programs are often

²⁹ UN Women (2022) *Gender inequality and human trafficking*. Available at: <https://www.unwomen.org/en/news/stories/2022/07/gender-inequality-and-human-trafficking>

³⁰ UNICEF (2023) *Child trafficking: Protecting children from exploitation*. Available at: <https://www.unicef.org/protection/child-trafficking>

³¹ International Organization for Migration (IOM) (2024) *Children and trafficking in human beings: Risks and responses*. Available at: <https://www.iom.int/children-and-trafficking-human-beings>

underfunded, non-existent, or made inaccessible by bureaucratic or legal hurdles, especially for victims without legal status.

These shortcomings can be witnessed through the case study of Ukraine's displaced populations. Following the Russo-Ukrainian war that erupted in 2022, millions of Ukrainian women and children were forced to flee to neighbouring countries³². The rising migrant and refugee waves caused an unprecedented risk of trafficking regarding said categories. Despite early alerts issued by the Council of Europe and civil society actors, many border and reception systems failed to implement adequate screening or protection protocols. In countries like Poland, Moldova, and Germany, reports emerged of women being deceived into exploitative labour or sexual exploitation under the guise of humanitarian aid, and of children being exposed to predatory actors³³. Despite the many efforts by the Council of Europe to promote and implement a fast and comprehensive approach to the issue, the disappointing lack of coordination and cooperation between migration/border control authorities and child protection agencies made the situation grow out of control.

The gendered dimension of trafficking is reflected in EU-wide data: women and girls comprise nearly three-quarters of all identified trafficking victims, with a growing number of children, especially from vulnerable backgrounds, among them³⁴. However, statistical recognition has not translated into proportionate resource allocation. Safe shelters are still scarce throughout Europe, access to reproductive and mental health services for victims of human trafficking is extremely unequal, and legal aid frequently depends on collaboration with law enforcement, which many victims are unable to accomplish because of trauma, fear, or unstable immigration status.

On the other hand, criminalization of undocumented migration deters many women and children from seeking help, as they fear arrest or deportation. This predicament not only obstructs victim identification but also effectively undermines the Council of Europe's human rights mandate. Essentially, most countries face the dilemma of human dignity and

³² Council of Europe (2023) *Trafficking risks increase for displaced Ukrainians, warns GRETA*. Available at: <https://www.coe.int/en/web/portal/-/greta-warns-of-increased-trafficking-risks-for-displaced-ukrainians>

³³ Human Rights Watch (2023) 'Ukraine war displacement sparks trafficking and exploitation risks', *Human Rights Watch*. Available at: <https://www.hrw.org/news/2023/04/18/ukraine-war-displacement-sparks-trafficking-and-exploitation-risks>

³⁴ European Commission (2023) *Trafficking victims in Europe: A rise by 10% and the share of EU nationals among the victims increased to 59%*. Available at: https://home-affairs.ec.europa.eu/news/trafficking-victims-europe-rise-10-and-share-eu-nationals-among-victims-increased-59-2023-02-09_en

protection versus border management, and in most cases, choose to prioritize the latter. As GRETA has consistently emphasized, identification must be separated from immigration enforcement, and all victims—regardless of status—must receive unconditional protection.

Finally, tackling the trafficking of women and children requires addressing root causes: poverty, conflict, discrimination, and gender inequality. It also necessitates reshaping institutional cultures that too often treat migrants and minorities as security threats rather than rights-holders. The Council of Europe, through its conventions, monitoring bodies, and policy frameworks, has the tools to lead this transformation—but member states must commit to operationalizing these instruments with sufficient political will, financial investment, and cross-sectoral coordination. Only through a sustained, rights-based, and gender-sensitive strategy can the promise of protection become a lived reality for those most at risk.

6.2. Forms of Exploitation

6.2.1. *Sexual exploitation - forced sex work*

Sex trafficking is one of the most widespread and most pressing human rights violations in Europe today. Despite heightened efforts on the part of governments and international agencies, thousands of women and girls continue to be trafficked and forced into prostitution across Europe. The Council of Europe, through initiatives such as the Group of Experts on Action against Trafficking in Human Beings (GRETA), has played a vital role in monitoring and combating such criminality.³⁵ However, many victims still face extreme legal, social, and psychological issues.³⁶

Sexual exploitation remains the most prevalent form of human trafficking in Europe. According to the 2022 United Nations Office on Drugs and Crime (UNODC) Global Report on Trafficking in Persons, 39% of detected trafficking victims worldwide were adult women, and another 19% were girls, the vast majority of whom were trafficked for sexual

³⁵ “All news - Action against Trafficking in Human Beings,” n.d.
<https://www.coe.int/en/web/anti-human-trafficking/all-news>.

³⁶ “Combating Trafficking in Human Beings,” n.d. <https://www.osce.org/combating-human-trafficking>.

exploitation.³⁷ In the European Union, it has been estimated that 60% of all identified victims of trafficking are exploited sexually, and Eastern European and Balkan states are significant source countries for victims who are then trafficked to wealthier Western and Northern European states.³⁸

The COVID-19 pandemic also exacerbated the situation, with reports indicating a 25% increase in reported cases of human trafficking worldwide from pre-pandemic levels.³⁹ Economic hardship, border closures, and increased usage of online platforms for recruitment and exploitation are among the reasons behind the increasing number of victims. Spain, Germany, France, and Italy remain some of the primary destinations for trafficked victims, whereas Romania, Bulgaria, and Ukraine are key source countries.⁴⁰

Spain has been one of the European countries most affected by human sexual exploitation and trafficking. Police investigations have uncovered such secret networks coercing women into what officials have called "invisible brothels."⁴¹ Victims are usually lured through ruses as offers of jobs or romantic relationships, only to be forced into prostitution upon arrival.⁴² Spanish police officials have also busted several such rings in recent years, exposing the gruesome conditions under which the victims are kept. In one such case, it was brought to light that sex traffickers would refer to women as "meat," underlining the complete dehumanization of victims involved in such illicit businesses.⁴³

³⁷ "Global Report on Trafficking in Persons 2022," n.d.

https://www.unodc.org/documents/data-and-analysis/glotip/2022/GLOTiP_2022_web.pdf.

³⁸ Migration and Home Affairs. "New Progress Report on Combatting Trafficking in Human Beings," January 20, 2025.

https://home-affairs.ec.europa.eu/news/new-progress-report-combatting-trafficking-human-beings-2025-01-20_en#:~:text=Trafficking%20for%20the%20purpose%20of%20the%20victims%20being%20male.

³⁹ "IMPACT OF THE COVID-19 PANDEMIC ON TRAFFICKING IN PERSONS Preliminary findings and messaging based on rapid stocktaking," n.d.

https://www.unodc.org/documents/Advocacy-Section/HTMSS_Thematic_Brief_on_COVID-19.pdf.

⁴⁰ EEAS. "Tackling Human Trafficking: More Urgent Than Ever in COVID Times," n.d.

https://www.eeas.europa.eu/eeas/tackling-human-trafficking-more-urgent-ever-covid-times_en.

⁴¹ Hantzaroula, Pothiti. "Prostitution in Athens' in TRAFFICKING IN WOMEN 1924-1926 THE PAUL KINSIE REPORTS FOR THE LEAGUE OF NATIONS VOL. 1I JEAN-MICHEL CHAUMONT MAGALY RODRÍGUEZ GARCÍA PAUL SERVAIS (EDS)." *Aegean*, January 1, 2017.

https://www.academia.edu/37543704/Prostitution_in_Athens_In_TRAFFICKING_IN_WOMEN_1924_1926_THE_PAUL_KINSIE_REPORTS_FOR_THE_LEAGUE_OF_NATIONS_VOL_1I_JEAN_MICHEL_CHAUMONT_MAGALY_RODR%C3%8DGUEZ_GARC%C3%8DA_PAUL_SERVAIS_EDS.

⁴² "Defensor del Pueblo Human Trafficking in Spain INVISIBLE VICTIMS," n.d.

https://www.defensordelpueblo.es/en/wp-content/uploads/sites/2/2017/04/Defensor_del_Pueblo_Human_Trafficking.pdf.

⁴³ "Situation Report Trafficking in human beings in the EU," n.d.

https://www.europol.europa.eu/sites/default/files/documents/thb_situational_report_-_europol.pdf.

Another well-known case in Cyprus also illustrates the challenges that victims of sexual exploitation face.⁴⁴ In 2019, a British teenager accused a group of men of gang-raping her in the resort town of Ayia Napa. Instead of being protected, she was charged with providing false information and convicted by Cypriot courts. The European Court of Human Rights subsequently ruled that the Cypriot authorities failed to conduct a proper investigation of her complaint and had not adopted a victim-centred approach. The Court ruled that the teenager was coerced into retracting her statement under duress, violating her rights under the European Convention on Human Rights.⁴⁵

Another celebrity case involved the young Nigerian female victim who was brought to Spain as a child.⁴⁶ Despite being shown beyond doubt to have been sexually exploited in prostitution, Spanish courts dismissed her complaints on procedural grounds.⁴⁷ In 2024, the ECtHR ruled in *T.V. v. Spain* that Spanish authorities had violated the terms of Article 4 of the European Convention on Human Rights, which prohibits slavery and forced labour. The Court held that the state failed to make a serious investigation of her trafficking claim and had failed to take proportionate measures to safeguard her.

Gaining compensation for injuries suffered by them is another important legal barrier for European sex trafficking victims.⁴⁸ Though European law recognizes the right of victims of trafficking to claim pecuniary reparation, the national courts in most cases fail to enforce it in practice. A milestone case in Bulgaria put this point on the agenda. In *Krachunova v. Bulgaria* (2023), a woman trafficked and forced into sex work sought damages for wages lost. Bulgarian courts denied her claim, asserting that the criminalization of prostitution precluded monetary claims. The ECtHR later ruled in her favour, affirming that victims of trafficking have the right to be compensated by their traffickers regardless of their nation's policy towards sex work.⁴⁹ This ruling created a useful precedent for future cases, affirming

⁴⁴ Lowbridge, By Caroline. "Ayia Napa: Woman Convicted of Gang Rape Lie Wins Appeal," January 31, 2022. <https://www.bbc.com/news/uk-england-derbyshire-60172176>.

⁴⁵ "Judgment concerning Cyprus," n.d. <https://www.echr.coe.int/w/judgment-concerning-cyprus-1>.

⁴⁶ "Judgment concerning Spain," n.d. <https://www.echr.coe.int/w/judgment-concerning-spain-4>.

⁴⁷ Hernández, José Antonio, José Antonio Hernández, and José Antonio Hernández. "Stolen, Lost, Trashed: What Can Happen When Spanish Courts Seize Your Assets." *EL PAÍS English*, January 25, 2017. https://english.elpais.com/elpais/2017/01/24/inenglish/1485262047_379569.html.

⁴⁸ "A Summary of Challenges Facing Legal Responses to Human Trafficking for Labour Exploitation in the OSCE Region," n.d. <https://www.osce.org/files/f/documents/0/5/24342.pdf>.

⁴⁹ "European Court of Human Rights reaffirms states' duties to investigate human trafficking in *T.V. v. Spain* judgment," n.d. <https://www.coe.int/en/web/anti-human-trafficking/-/european-court-of-human-rights-reaffirms-states-duties-to-investigate-human-trafficking-in-t.v.-v.-spain-judgment>.

the principle that victims of trafficking should be allowed the opportunity to obtain reparations for the exploitation to which they have been subjected. However, there are still difficulties, since many victims fear retaliation from their traffickers or are unable to access complex legal systems that are inimical to them.

Forced prostitution and sexual exploitation continue to be widespread within the member countries of the Council of Europe.⁵⁰ Despite legal regulations and control structures being strengthened, effective enforcement remains unbalanced. The recent uptick in the number of cases of trafficking since the pandemic has highlighted the need for stronger protections for victims, better investigations, and stronger enforcement against traffickers. ECtHR court judgments have played a powerful role in shaping Europe's approach to human trafficking, but such efforts are only the beginning to ensure that victims receive justice, protection, and reparations. Addressing such challenges involves legal reforms, but even more importantly, social reformation and economically viable action that targets trafficking at the source and provides survivors with much-needed care so that they can begin to heal and rebuild their lives.⁵¹

6.2.2. Slavery and Forced Labour

Contemporary slavery and forced labour are acute human rights concerns in Europe, disproportionately affecting vulnerable groups. Despite extensive legislation in place, criminalizing the behaviour, the exploitation of vulnerable groups persists in overt and covert forms. The most adversely affected are migrant workers, Roma people, women and girls, and children, groups who experience institutional discrimination, socio-economic exposure, and inadequate legal protection, rendering them most vulnerable to exploitation.

Migrant workers, especially from Eastern Europe, South Asia, and Africa, are commonly exploited in the low-paying sectors of agriculture, construction, and domestic work. In

⁵⁰ "COMPENSATION FOR VICTIMS OF HUMAN TRAFFICKING: INCONSISTENCIES, IMPEDIMENTS AND IMPROVEMENTS Master Thesis Criminology Jeltsje Cusveller," n.d.
<https://documentation.lastradainternational.org/lsidocs/3226-Compensation%20for%20victims%20of%20human%20trafficking%20-%20Cusveller.pdf>.

⁵¹ "European Court of Human Rights affirms the right of victims of sex trafficking to seek compensation from their traffickers in respect of lost earnings," n.d.
<https://www.coe.int/en/web/anti-human-trafficking/-/european-court-of-human-rights-affirms-the-right-of-victims-of-sex-trafficking-to-seek-compensation-from-their-traffickers-in-respect-of-lost-earnings>.

Greece alone, several instances have been recorded of illegal Bangladeshi and Pakistani workers being coerced into working inhumanely within agricultural areas without pay or minimal rights. The Roma people, especially in Romania and Bulgaria, also bear the brunt of forced labour and human trafficking.⁵² They are often forced into begging or exploited through organized crime networks that bring them across international borders. The same applies to women and girls, who form the majority of Europe's trafficking victims, and who are then subjected to sexual exploitation in large measure. Children are not spared either. In the United Kingdom, around 31% of all reports of modern slavery in 2024 involved children, who are often exploited for work, begging, or criminal activity.⁵³

The numbers speak for themselves. In 2024 alone, the United Kingdom found a record number of 19,125 potential victims of modern slavery, and non-government estimates place the real number as high as 130,000. From 2014 to 2022, 85% of the trafficked victims being exploited in Europe originated from within Europe itself, including Eastern European countries.⁵⁴ Of the total, 61% were exploited through labour, namely, construction, farming, and service industries, without checks.

Furthermore, recent EU statistics show that during 2022, forced labour comprised 41.1% of all forms of exploitation, an increase from the previous year of 28%, revealing a serious spike in trafficked labour-based cases.⁵⁵

Consequently, the Council of Europe has introduced several landmark measures. One of its most prominent instruments is the Convention on Action Against Trafficking in Human Beings, which establishes a legal and institutional framework focused on prevention, victim protection, and prosecution. This convention created the Group of Experts on Action against Trafficking in Human Beings (GRETA), which oversees the implementation of anti-trafficking measures by member states. In addition, forced labor and slavery are explicitly barred under the European Convention on Human Rights in Article 4.⁵⁶ Landmark

⁵² "Trafficking of migrant workers for forced labour," n.d. <https://pace.coe.int/en/files/19400/html>.

⁵³ "Modern slavery cases in Britain reach record high," n.d. <https://www.reuters.com/world/uk/modern-slavery-cases-britain-reach-record-high-2025-03-06/>.

⁵⁴ "Victims exploited in Europe," n.d. <https://www.ctdatacollaborative.org/story/victims-exploited-europe-0#no-back>.

⁵⁵ European Parliamentary Research Service. "Global Percentages of Victims by Form of Exploitation." *Epthinktank*, November 28, 2024. <https://epthinktank.eu/2024/11/28/human-trafficking-the-gender-dimensions/global-percentages-of-victims-by-f-or-m-of-exploitation/>.

⁵⁶ "Prohibition of slavery and forced labour: landmark judgments," n.d.

cases such as *Siliadin v. France* reconfirmed the state's obligations towards ending all forms of modern slavery. The Council has also come up with a sweeping policy guide that urges its Member States to increase labour monitoring, regulate job agencies, and ensure robust victims' support provisions.

Further assistance has also been targeted on particular regions. For instance, the Council of Europe, along with the European Union, has taken targeted actions to combat labour trafficking in the Western Balkans, assisting countries such as Bosnia and Herzegovina, Serbia, and North Macedonia. Some of these measures include policymaking based on studies, harmonizing legislation, and capacity-building exercises for strengthening national action against forced labour.⁵⁷

6.3. Technology in modern human trafficking

According to the Head of the Council of Europe Office in Sarajevo, Bojana Urumova, *"The widespread use of information and communication technology in the recruitment, control and exploitation of victims of human trafficking - many of whom are children – poses a major challenge. However, tech tools can also be part of the solution, by helping law enforcement authorities to detect, investigate, and prosecute human trafficking cases"*.⁵⁸

The emergence of electronic technologies has revolutionized the dynamics of human trafficking, allowing traffickers to utilize cyberspace for recruiting, organizing, and exploiting the victims. Human trafficking has developed with the advancement in technology, as traffickers utilize digital technology to enhance the efficiency of their activities and cover longer distances. The Council of Europe's 2022 report points out the serious role played by technology in facilitating various phases of trafficking, such as recruitment and exploitation.⁵⁹

<https://www.coe.int/en/web/human-rights-convention/slavery1>.

⁵⁷ "European Union and Council of Europe continue to support Western Balkans in fighting human trafficking for labour exploitation," n.d.

[https://www.coe.int/en/web/sarajevo/-/european-union-and-council-of-europe-continue-to-support-western-balkan s-in-fighting-human-trafficking-for-labour-exploitation](https://www.coe.int/en/web/sarajevo/-/european-union-and-council-of-europe-continue-to-support-western-balkan-s-in-fighting-human-trafficking-for-labour-exploitation).

⁵⁸ "The Impact of digital technology on human trafficking: changing the way we respond highlighted at conference in Sarajevo," n.d.

<https://www.coe.int/en/web/anti-human-trafficking/-/the-impact-of-digital-technology-on-human-trafficking-changing-the-way-we-respond-highlighted-at-conference-in-sarajevo>.

⁵⁹ "Online and technology -facilitated trafficking in human beings Full report," n.d.

6.3.1. Social media as a means of recruiting victims

Social digitalization has also transformed the operation of human trafficking networks. Concerning is the extensive utilization of social media platforms in the solicitation and exploitation of trafficking victims. Social media offers traffickers a cheap, low-risk, and highly efficient platform for reaching vulnerable populations, including young people, migrants, and individuals in socioeconomically vulnerable circumstances. Social media platforms provide abusers unfettered space in which to come together, to groom, and ultimately to coerce prospective victims into exploitative situations.⁶⁰

There are several different but concurrent ways that traffickers use social media. They use pretend identities as real employers, fashion agents, or possible dating interests. This approach aligns with digital grooming theory, which posits that perpetrators use trust-establishing strategies to normalize long-term exploitation, particularly where there is a lack of guardianship — parental or platform-based — regulation. In addition to that, they take advantage of algorithmic recommendation networks to target individuals who are already consuming vulnerable content, e.g., hashtags related to poverty, migration, or low-wage labour. Lastly, traffickers manipulate digital photographs and create narratives of achievement to glorify recruitment by framing exploitative situations (e.g., coerced prostitution) as lucrative life choices.⁶¹

Empirical evidence validates the central role of social media in modern networks of trafficking. The European Commission's 2024 trend study on human trafficking reveals that over 60% of victims who were under the age of 25 reported being initially approached by the trafficker via the internet, primarily via social media or messaging platforms. A 2022 Europol report also observed that "digital platforms are increasingly the primary vector of human trafficking recruitment, particularly in cases involving sexual exploitation."⁶²

<https://rm.coe.int/online-and-technology-facilitated-trafficking-in-human-beings-full-rep/1680a73e49>.

⁶⁰ Europol. "Targeted: Human Traffickers Luring Victims Online | Europol," n.d.

<https://www.europol.europa.eu/media-press/newsroom/news/targeted-human-traffickers-luring-victims-online?>

⁶¹ "View of GRETA's First Years of Work: Review of the Monitoring of Implementation of the Council of Europe Convention on Action Against Trafficking in Human Beings | Anti-Trafficking Review," n.d.

<https://antitraffickingreview.org/index.php/atrjournal/article/view/18/21>

⁶² Europol. "Targeted: Human Traffickers Luring Victims Online | Europol," n.d.

<https://www.europol.europa.eu/media-press/newsroom/news/targeted-human-traffickers-luring-victims-online>

The Council of Europe has identified the new ICT threats in the context of human trafficking. In its 2022 report on "Online and Technology-Facilitated Human Trafficking," GRETA emphasized that member states need to criminalize online grooming urgently, law enforcement agencies need to enhance their digital investigative capacity, and social media platforms need to be held accountable for content moderation failures. Despite certain progress, there are still gaps in regulation and enforcement, especially considering the transnational and concealed nature of online communications.

6.3.2. Online black market for organ trafficking and Transplant Tourism

The illegal sale of human organs is one of the most abhorrent and morally deplorable forms of human trafficking. Less visible than for sexual or labour exploitation, organ trafficking occurs through a networked system worldwide of brokers, corrupt medical professionals, and vulnerable individuals coerced into selling their organs. Increasingly, the virtual aspect of organ trafficking — particularly through dark web forums, encrypted messaging apps, and surreptitious online postings — facilitates such illicit sales to be orchestrated in anonymity.

Organ trafficking tends to co-occur with larger human trafficking networks. Migrants, refugees, and poor people are especially at risk. After conflicts such as the Ukraine conflict or the Syria unrest, the displaced have fallen prey to human traffickers masquerading as humanitarian facilitators or job recruiters. In a few documented cases, victims were promised a journey to Europe or debt cancellation if they agreed, under duress or deception, to donate a kidney. Such an imbalance in power and information renders any plea of "consent" void.

Victims of organ trafficking are also recruited through the same internet mechanisms as for regular human trafficking. Social media and online classifieds can advertise fake opportunities for medical examination, "voluntary donations," or overseas work, especially for persons in economic need. In some instances, the coercion is subtle, on the basis of exploitative agreements signed unknowingly or under pressure. In others, it is gross fraud or even kidnapping. The high demand coupled with the rarity of approved organ donations

drives black-market organ demand, especially among countries with undeveloped transplant systems.

Black-market organ trafficking renders statistical reports unreliable. An estimated 5% to 10% of all transplants globally are estimated to be conducted using trafficked organs by the World Health Organization.⁶³ In Europe, Eastern and Southeastern European countries, such as Moldova, Ukraine, and Albania, have been identified as source countries and transit countries.⁶⁴ For instance, in the 2023 UK case of the Nigerian politician, one of the victims of trafficking was taken under false auspices to donate a kidney to the politician's daughter. In this case, the UK Modern Slavery Act was a landmark recognition of organ trafficking as human trafficking.⁶⁵

With the rise of encrypted communications technology and ungoverned cyberspace, traffickers have adapted. Organ trade, a specialized but consistent phenomenon on the dark web, is one where kidney and liver listings are added to narcotics and weapons. Cryptocurrencies and peer-to-peer exchange render the financial aspect of the business opaque. As per a 2021 INTERPOL report on cybercrime, some darknet markets have advertised human kidneys for as much as €150,000, with procurement and post-operative logistics negotiated through secure means such as Telegram or ProtonMail.⁶⁶

Transplant tourism is now more of a spin-off of the organ trafficking issue. Wealthy Europeans have gone to where there is less medical regulation, e.g., peripheral regions of South Asia, North Africa, or Eastern Europe, and received organs from intermediaries. These patients might not be aware of the trafficking consequences, though in most cases, they are knowingly avoiding domestic legal frameworks. The Istanbul Declaration (2008), endorsed by several international medical societies, considers transplant tourism where organs are being bought or coerced as illegal and unethical.

⁶³ Ambagtsheer, Frederike, Damián Zaitch, René Van Swaaningen, Wilma Duijst, Willij Zuidema, and Willem Weimar. "Cross-Border Quest: The Reality and Legality of Transplant Tourism." *Journal of Transplantation* 2012 (January 1, 2012): 1–7. <https://doi.org/10.1155/2012/391936>.

⁶⁴ Arias, Omar S., Carolina Sánchez-Páramo, María E. Dávalos, Indhira Santos, Erwin R. Tiongson, Carola Gruen, Natasha De Andrade Falcão, Gady Saiovici, and Cesar A. Cancho. *Back to Work: Growing With Jobs in Europe and Central Asia*. The World Bank eBooks, 2014. <https://doi.org/10.1596/978-0-8213-9910-1>.

⁶⁵ Braithwaite, John. *Corporate Crime in the Pharmaceutical Industry (Routledge Revivals)*. Routledge, 2013.

⁶⁶ INTERPOL, and INTERPOL. "Trafficking of Human Beings for the Purpose of Organ Removal in North and West Africa." Analytical report. ENACT. 2021. Reprint, INTERPOL, 2021. <https://www.interpol.int/content/download/16690/file/2021%2009%2027%20THBOR%20ENGLISH%20Public%20Version%20FINAL.pdf>.

Despite the Council of Europe's Convention against Trafficking in Human Organs establishing a good legal framework for reducing these activities, there are only a handful of European nations that have ratified and fully implemented it. GRETA has highlighted failure to detect trafficked victims on a systemic level among those who are trafficked for organ removal, noting that victims tend to evade health systems and investigations.

Integral to organ trafficking is transplant tourism, by which individuals from wealthy countries journey abroad to purchase organs, often unaware—or wilfully uninformed—of the exploitative conditions in which they were procured. Countries with poor controls and institutions in corruption become hubs for such activity, which is extremely unethical and illegal.⁶⁷ Transplant tourism not only promotes organ trafficking but also undermines the legitimacy of international transplant systems. The Istanbul Declaration on Organ Trafficking and Transplant Tourism (2008) unequivocally condemned the practice, yet enforcement remains inconsistent.⁶⁸

The Council of Europe has sought to address these concerns through policy and legal tools. Notably, the Convention against Trafficking in Human Organs (CETS No. 216), which came into force in 2018, criminalizes illegal organ removal from the human body and mandates openness in transplantation regimes. It makes parties subject to obligations to stop trafficking, to safeguard victims, and to international cooperation to investigate transnational offenses. Ratification, however, has been limited thus far, and its effective enforcement across jurisdictions is uneven.

In addition, the Council's Convention on Human Rights and Biomedicine (Oviedo Convention, CETS No. 164) and its Additional Protocol on Transplantation of Organs and Tissues (CETS No. 186)⁶⁹ highlight the ethical values of consent, non-commercialization, and fair access. Even with these instruments, the new online aspects of organ trafficking —

⁶⁷ Roberts, Adrienne. "The Political Economy of 'Transnational Business Feminism.'" *International Feminist Journal of Politics* 17, no. 2 (January 28, 2014): 209–31. <https://doi.org/10.1080/14616742.2013.849968>.

⁶⁸ Amahazion, Fikresus. "Epistemic Communities, Human Rights, and the Global Diffusion of Legislation Against the Organ Trade." *Social Sciences* 5, no. 4 (October 27, 2016): 69. <https://doi.org/10.3390/socsci5040069>.

⁶⁹ "European Treaty Series - No. 164 Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine: Convention on Human Rights and Biomedicine," n.d. <https://rm.coe.int/168007cf98>.

e.g., organ sales organized through Telegram or the dark web — need to be addressed by the international community, and cyber-specific monitoring tools developed.

Finally, both the role of social media in trafficking and the existence of virtual black markets for organs indicate the need to integrate digital governance into anti-trafficking policy. Combating these threats requires not only updated codes of law and concerted global enforcement, but cultural and technological change that makes digital accountability and victim protection the centre of state and corporate responsibility.

6.4. Rehabilitation & Reintegration of Victims

Victims of human trafficking suffer severe, chronic physical and psychological injuries. Rehabilitation and reintegration are crucial elements of a human rights-based response to human trafficking, not only supplementary strategies to prevention and punishment. Assistance to victims must be comprehensive, rights-based, and customized to meet their specific needs, according to the Council of Europe Convention on Action against Trafficking in Human Beings. This covers medical and psychological treatment, social integration, legal assistance, and safeguards against re-victimization. Nevertheless, member state implementation is still inconsistent and frequently falls short of the Convention's goals. Post-operative care and preventing re-victimization are two of this rehabilitative agenda's most urgent issues.

6.4.1. Post-Operative Healthcare for Trafficking Victims

Trafficking victims frequently suffer from significant physical trauma, particularly when forced labour, sexual exploitation, or organ trafficking are involved. They might have untreated wounds, ongoing infections, STDs, or physical degradation from years of neglect when they get to medical institutions. For instance, injuries from physical abuse, complications from forced abortions, or neglected gynaecological diseases may necessitate immediate surgical procedures. In fewer but more serious instances, victims who are trafficked for the purpose of organ removal may have surgery performed in an uncontrolled,

coercive, or cruel manner, which could result in systemic infections or long-term organ damage.⁷⁰

For these patients, post-operative care is an essential part of rehabilitation rather than just a medical issue. Sadly, the healthcare system for victims of human trafficking is frequently disjointed, underfunded, and unprepared to handle the unique trauma experienced. Following surgery, many victims are released with minimal psychological assistance, insufficient pain management, or little follow-up. Their capacity to engage in legal processes or social reintegration programs is compromised, healing is hampered, and trauma is made worse by this carelessness. Post-operative treatment must be approached with a trauma-informed perspective. When treating victims of human trafficking, healthcare systems need to take into account the larger context of abuse and compulsion. Informed consent, privacy, continuity of care, and culturally relevant services are all part of this. Physical healing must also be accompanied by mental health treatment because medical procedures can exacerbate or provoke the psychological repercussions of human trafficking, which can range from dissociative disorders to PTSD and depression, if they are handled insensitively. For example, if traffickers exploited healthcare access during their exploitation, victims may show fear or mistrust of authority figures, including medical professionals.⁷¹

Under the Council of Europe framework, victims have the right to medical care without conditionality on their cooperation with law enforcement. Nonetheless, a lot of national institutions still equate help with involvement in criminal cases. This goes against the Convention's victim-centred ideals and can discourage survivors from getting support. The most vulnerable are further marginalized since undocumented victims frequently encounter financial or legal obstacles while trying to obtain post-operative treatment. Member states are urged to guarantee free, comprehensive medical care for all trafficking survivors during the recovery phase, irrespective of their nationality or place of residence, and to disentangle access to health services from immigration status.

⁷⁰ International Organization for Migration (IOM) (2009) *Caring for Trafficked Persons: Guidance for Health Providers*. Geneva: IOM. Available at: <https://www.iom.int/caring-trafficked-persons-guide-health-providers>

⁷¹ Hopper, E.K., Azar, N., Bhatt, R. and Cheng, D.M. (2021) 'Sex trafficking survivors' recommendations for healthcare practices', *Journal of Human Trafficking*, 8(3), pp. 296–310. Available at: <https://pubmed.ncbi.nlm.nih.gov/34485751/>

Medical personnel must also receive training to provide a strong post-operative healthcare model. The knowledge and resources necessary to recognize victims of human trafficking, offer trauma-informed care, or connect patients with the right resources are often lacking among frontline medical professionals⁷².

Lastly, cooperation between legal experts, anti-trafficking NGOs, and healthcare institutions is essential. In order to protect victims, encourage recovery, and support their overall reintegration process, medical professionals must be a part of a coordinated, multidisciplinary strategy.

6.4.2. Re-Victimization

“Re-victimization refers to the recurrence of abuse, coercion, or exploitation experienced by trafficking survivors after exiting their initial trafficking situation”. This is a common phenomenon and represents one of the most pressing failures in anti-trafficking response systems. It is a result of a combination of inadequate support services and legal voids. Survivors are especially vulnerable during the transition from emergency care to long-term reintegration⁷³. Without access to safe housing, stable employment, psychological support, and legal protection, many victims find themselves in bad circumstances that traffickers or criminal networks exploit anew. Women who escape sexual exploitation, for instance, may be re-targeted by pimps. The risk of re-victimization is compounded by socio-economic marginalization. Many trafficking victims face legal uncertainty regarding their residency status, limited access to education or employment, and xenophobic or racist attitudes. Such conditions push survivors into situations where exploitation is more likely, and protections are minimal⁷⁴.

The Council of Europe Convention explicitly mandates the provision of long-term assistance to victims, including social housing, vocational training, education, and psychological counselling. Many states lack formal reintegration policies or clear guidelines for

⁷² West, J. (2018) 'Human sex trafficking survivors need better trained doctors', Teen Vogue, 2 March. Available at: <https://www.teenvogue.com/story/human-sex-trafficking-survivors-need-better-trained-doctors>

⁷³ Viergever, R.F., van Driel, T., Durand, M.A., Thorogood, N. and Wolf, J.R.L. (2019) 'The recovery experience of people who were sex trafficked: The thwarted journey towards goal pursuit', *BMC International Health and Human Rights*, 19(1), pp. 1–10. Available at: <https://doi.org/10.1186/s12914-019-0185-7>

⁷⁴ Krushas, A.E. and Kulig, T.C. (2024) 'Exploring consequences of sex trafficking victimization among individuals with and without disabilities', *Journal of Human Trafficking*, 11(1), pp. 38–54. Available at: <https://doi.org/10.1080/23322705.2024.2426941>

cooperation between governmental and non-governmental actors. Survivors are thus facing a legal paradox, being recognized as victims, yet practically unsupported in the process of rebuilding their lives. Moreover, the criminalization of irregular migration is indeed a factor that contributes to victimization. Victims who lack legal documentation often avoid accessing state services due to fear of arrest or deportation. In such cases, traffickers exploit their legal precarity by offering "protection" or employment, ultimately exploiting them. This underscores the need for granting temporary residence permits, aiming to facilitate long-term recovery. Law enforcement officers, social workers, and migration authorities must be trained to understand what coercion and trauma mean. Survivors should not be treated as criminals or illegal migrants but as people with rights entitled to care, dignity, and self-determination.

In conclusion, rehabilitation and reintegration are foundational to a human rights-based response that respects the dignity, autonomy, and safety of survivors. Post-operative healthcare and prevention of re-victimization represent two crucial aspects of this response. The Council of Europe has taken steps for its member states, but there is still a gap between legal commitment and practical implementation. Bridging this gap requires political will and investment in victim support. Only through comprehensive action can we ensure that freedom from trafficking ensures the presence of dignity.

6.5. Ethical Considerations on the Potential of a Legal Organ Market

In the past few years, the significant gap between the demand and supply for transplantable organs, which often leads to prolonged waiting times for patients in need, and in certain circumstances, preventable deaths,⁷⁵ has raised discussions on the potential of establishing a legal organ market. According to the University of North Carolina, a legal organ market can be defined as *"a broad system of exchange in which some form of valuable consideration, monetary or otherwise, is offered in return for a human organ"*.⁷⁶ In this context, however, there are certain ethical concerns arising on the matter of social and

⁷⁵ Landau, Misia. 2008. "The Organ Trade: Right or Wrong?" Hms.harvard.edu. March 7, 2008.
<https://hms.harvard.edu/news/organ-trade-right-or-wrong>.

⁷⁶ "Considering a Market in Human Organs." 2025. North Carolina Journal of Law & Technology. 2025.
<https://journals.law.unc.edu/ncjolt/articles/considering-a-market-in-human-organs/>.

religious character, often associated to human exploitation, dignity and body commodification.⁷⁷

First and foremost, the introduction of a potential legal organ market might exacerbate severe social inequalities. Precisely, the already marginalized groups and people of lower socio-economic background might be led to further exploitation, extending the cycle of poverty while being subject to health deterioration, since they might feel compelled to sell their organs not out of genuine consent, but due to economic necessity.⁷⁸ According to the 2001 Study conducted by Dr.Goyal⁷⁹ for social-scientific purposes, out of 305 surveyed paid kidney 'donors' in Chennai, 96% had sold their organ to pay off debts. Post-operation, the average family income declined by one-third, and 74% of participants remained in debt six years later. Additionally, 86% reported health deterioration, including persistent pain and long-term back issues. Notably, 79% stated they would not recommend selling a kidney to others in similar circumstances.

In addition, academic literature also argues that establishing a market would demote human organs to “trade objects,” treating the human body as a commodity, diminishing human moral worth.⁸⁰ On this basis, it is also worth mentioning that several scholars connect the issue with the cornerstone of human rights, the Universal Declaration of Human Rights⁸¹ viewing human dignity as a foundation for freedom, peace, and justice.⁸² Therefore, commodifying body parts for trade undermines this principle by reducing individuals to mere tools for achieving an end, rather than recognizing them as valuable ends in themselves.

⁷⁷ Andorno, Roberto. 2017. “Buying and Selling Organs: Issues of Commodification, Exploitation and Human Dignity.” *Journal of Trafficking and Human Exploitation*. 2017.
https://www.academia.edu/34780693/Buying_and_selling_organs_issues_of_commodification_exploitation_and_human_dignity?

⁷⁸ Koplin, Julian. 2014. “Assessing the Likely Harms to Kidney Vendors in Regulated Organ Markets.” *The American Journal of Bioethics* 14 (10): 7–18. <https://doi.org/10.1080/15265161.2014.947041>.

⁷⁹ Greasley, Kate. 2012. “A Legal Market in Organs: The Problem of Exploitation.” *Journal of Medical Ethics* 40 (1): 51–56. https://www.academia.edu/1995290/A_legal_market_in_organs_the_problem_of_exploitation?.

⁸⁰ Andorno, Roberto. 2017. “Buying and Selling Organs: Issues of Commodification, Exploitation and Human Dignity.” *Journal of Trafficking and Human Exploitation* 1 (2): 119–27.
<https://doi.org/10.7590/245227717x15090911046502>.

⁸¹ United Nations. 1948. “Universal Declaration of Human Rights.” United Nations. United Nations. 1948.
<https://www.un.org/en/about-us/universal-declaration-of-human-rights>.

⁸² Campbell, Alastair V. 2014. “Human Dignity and Commodification in Bioethics.” *Cambridge University Press EBooks*, April, 535–40. <https://doi.org/10.1017/cbo9780511979033.068>.

Nevertheless, there are also important cultural and religious beliefs that significantly influence the attitude towards the commodification of human organs, raising more concern on the matter at hand, indicating culturally sensitive approaches in discussions.⁸³

These perspectives are often rooted in deeply held beliefs about the body, death, and the afterlife. For instance, in Christianity, organ donation is generally viewed as an act of charity and compassion. However, some Christian denominations express concerns about the sanctity of the body and the implications of interfering with the natural process of death, which can affect willingness to donate. Similarly, in Islam, there are varying interpretations of organ donation, with some Islamic scholars permitting it as an act of saving life, while others raise concerns due to the perceived sanctity of the body and the religious requirements around death.⁸⁴

Furthermore, cultural factors also play a pivotal role in shaping attitudes toward organ donation. For many cultures, family approval is essential before donation can take place, even if the deceased individual had expressed a willingness to donate. This cultural practice can act as a significant barrier, especially when family members are either uninformed or unsupportive of the decision. In addition, misconceptions and cultural taboos about organ donation, such as fears about body mutilation or misunderstandings about religious prohibitions, can deter individuals from considering organ donation as an option. These taboos often stem from a lack of education or awareness about the ethical and medical processes involved in organ donation.⁸⁵

Concluding, while a potential organ market may appear to be a viable option to bridge the increasing gap between demand and supply of transplantable organs, it has ingrained several ethical, social, and cultural problems. The possibility of exploitation, particularly of vulnerable groups, is a direct violation of social justice, seeing as economic need would effectively force them to sell their organs against their will, with permanent damage to their health and well-being. To make matters worse, the commodification of the human body by

⁸³ COTRAU, Petru, Viviana HODOSAN, Adriana VLADU, Cristian DAINA, Lucia Georgeta DAINA, and Carmen PANTIS. 2019. "Ethical, Socio-Cultural and Religious Issues in Organ Donation." *Mædica* 14 (1): 12–14. <https://doi.org/10.26574/maedica.2019.14.1.12>.

⁸⁴ Doerry, Katja, Jun Oh, Deirdre Vincent, Lutz Fischer, and Sebastian Schulz-Jürgensen. 2022. "Religious and Cultural Aspects of Organ Donation: Narrowing the Gap through Understanding Different Religious Beliefs." *Pediatric Transplantation* 26 (7). <https://doi.org/10.1111/ptr.14339>.

⁸⁵ Joseph, Thresiamma, and Priya Reshma Aranha. 2024. "Beliefs, Cultural, and Religious Aspects of Organ Donation: A Focus Group Study among College Students in South India." *Journal of Datta Meghe Institute of Medical Sciences University* 19 (4): 774–79. https://doi.org/10.4103/jdmimsu.jdmimsu_598_24.

allowing the sale of human body parts derogates from inherent dignity and moral worth of human beings, contravening basic principles of human rights. At the same time, cultural and religious attitudes take precedence in influencing organ donation attitudes and hence making it essential to adopt culturally responsive approaches in addressing the issue.

7. Conclusion

Human trafficking is one of the most rooted and widespread human rights problems facing Europe at present. Vulnerable groups - i.e., migrants, refugees, women, children, and marginalized groups- continue to be disproportionately targeted by traffickers, exploiting their vulnerable situation for profit and control. The boom of the digital age only adds fuel to the fire, with traffickers employing social networking sites to attract victims and the virtual black market to fuel organ trafficking and transplant tourism.

While attempts have been made to support survivors—e.g., post-operative care and reintegration programs—there remain significant gaps, particularly in preventing re-victimization and the psychological effects of trauma. The ethical dilemma of a potential legal organ market also makes it harder to combat trafficking, wondering if regulation would make the crisis better or worse.

The Council of Europe has taken steps to fight trafficking by legislating, launching information campaigns, and helping victims. But the persistence of these crimes and emerging, foreboding tendencies indicate that all these steps, commendable as they are, are still inadequate. More cross-border collaboration, technological regulation, and victim-oriented activities are needed with a sense of urgency. Until that time arrives, however, the dark undertows of human trafficking will continue to erode human dignity and justice within Europe.

8. Points to be addressed

1. In addressing the rising demand for transplantable organs, how can the Committee of Ministers develop policy responses that balance medical necessity with the ethical, social, and cultural concerns surrounding organ commodification?
2. Given the persistent implementation gap in anti-trafficking policies, how can the Committee of Ministers enforce greater compliance with the Convention on Action against Trafficking in Human Beings, especially to protect migrants, women, and children?
3. Given GRETA's limited authority, should the Committee of Ministers consider mechanisms to make GRETA's recommendations binding in cases of repeated non-compliance by member states?
4. How can member states be encouraged to adopt victim-centered approaches in trafficking cases, particularly in legal frameworks?
5. What mechanisms can the Council of Europe implement to ensure better enforcement of anti-trafficking laws across diverse legal systems?
6. How can governments differentiate between migrants and refugees in anti-trafficking strategies, while still ensuring both groups receive adequate protection?
7. What gender-specific mechanisms should states implement to better protect women from sexual exploitation in migration and trafficking contexts?
8. What specific social protections can be implemented to prevent survivors from falling back into exploitative environments?
9. How can the rights of unaccompanied minors be safeguarded when child protection and migration systems are fragmented and poorly coordinated?

10. How can national governments standardize and enforce compliance with the Council of Europe Convention's minimum care standards across all regions?
11. How can the Council of Europe ensure that trafficking survivors have access to long-term social and economic reintegration programs?
12. What could the Council of Europe do to further ensure that member states maintain rigorous victim identification processes in trafficking cases?

9. Bibliography

9.1. Primary Sources

- “Council of Europe Treaty Series - No. 196 Council of Europe Convention on the Prevention of Terrorism.” n.d. <https://rm.coe.int/16808c3f55>.
- “Council of Europe Treaty Series - No. 197 Council of Europe Convention on Action against Trafficking in Human Beings.” n.d. <https://rm.coe.int/168008371d>.
- “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.” Official Journal of the European Union, L 101/1, 15 April 2011. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32011L0036>.
- GRETA. *Report Concerning the Implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Greece: Third Evaluation Round*. Strasbourg: Council of Europe, 2023. <https://rm.coe.int/greta-2023-04-fgr-grc-en/1680ac3a28>.
- UNODC. *Global Report on Trafficking in Persons 2022*. United Nations Office on Drugs and Crime. <https://www.unodc.org/unodc/en/data-and-analysis/glotip.html>.
- U.S. Department of State. *Trafficking in Persons Report 2023*. <https://www.state.gov/reports/2023-trafficking-in-persons-report/>.
- European Commission. *Study on the Economic, Social and Human Costs of Trafficking in Human Beings within the EU*. Luxembourg: Publications Office of the European Union, 2020.
- Group of Experts on Action against Trafficking in Human Beings (GRETA). *3rd Evaluation Round: Greece*. 2023.

9.2. Secondary Sources

- International Centre for Migration Policy Development (ICMPD). *Trafficking Along Migration Routes to Europe: Bridging the Gap Between Migration, Asylum and Anti-Trafficking*. Vienna: ICMPD, 2021.

○

- National Commission for Human Rights (EEDA). *Special Report on Human Trafficking in Greece*. 2021.
- Hellenic Ministry for Migration and Asylum. *National Referral Mechanism for the Protection of Victims of Human Trafficking in Greece Annual Report 2021*.
- Akrivopoulou, Christina. *Θεμελιώδη Δικαιώματα και Εμπορία Ανθρώπων στην Ευρωπαϊκή Ένωση*. Thessaloniki: Sakkoulas, 2021.
- “Το Νέο Εθνικό Σχέδιο Δράσης Κατά της Εμπορίας Ανθρώπων.” *Ελληνική Δημοκρατία – Υπουργείο Εξωτερικών*, December 2022.

9.3. Legal Texts

- “Directive 2011/36/EU of the European Parliament and of the Council.”
- “Council of Europe Convention on Action against Trafficking in Human Beings.”
- “Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime (Palermo Protocol).”
- “National Law 4251/2014 (Immigration and Social Integration Code) – Greece.”
- European Commission. *Strategy on Combatting Trafficking in Human Beings 2021–2025*.
- “Greek Penal Code, Article 323A – Trafficking in Human Beings.”
- Ministry of Justice. *National Action Plan Against Human Trafficking (2022–2026)*.

9.4 Books

- Gallagher, Anne T. *The International Law of Human Trafficking*. Cambridge University Press, 2010.
- Akrivopoulou, Christina. *Θεμελιώδη Δικαιώματα και Εμπορία Ανθρώπων στην Ευρωπαϊκή Ένωση*. Thessaloniki: Sakkoulas, 2021.
- Allain, Jean. *Slavery in International Law: Of Human Exploitation and Trafficking*. Martinus Nijhoff, 2013.
- Askola, Heli. *Legal Responses to Trafficking in Women for Sexual Exploitation in the European Union*. Hart Publishing, 2007.

9.5. Articles

- “Έμπορία Ανθρώπων στην Ελλάδα: Μια Επιδημία Σιωπής.” *HumanRights360.org*, October 2022.
<https://www.humanrights360.org/emporia-anthropon-stin-ellada/>.
- Anagnostopoulos, Irene. “Legal Gaps and Protection Failures: Human Trafficking in the Greek Asylum System.” *Journal of Human Rights Practice* 15, no. 2 (2023): 278–294.
- “Το Trafficking στην Ελλάδα: Στα Πλέγματα της Εκμετάλλευσης.” *Εφημερίδα των Συντακτών*, May 2022.
- Papakonstantinou, Athanasios. “Human Trafficking in Greece: Between Victim Protection and Border Control.” *European Journal of Migration and Law* 25, no. 1 (2023): 49–76.

9.6. Websites

- GRETA official page: <https://www.coe.int/en/web/anti-human-trafficking/greta>.
- UNODC Global TIP page:
<https://www.unodc.org/unodc/en/data-and-analysis/global-tip.html>.
- Greek National Referral Mechanism: <https://nrm.gov.gr/>.
- U.S. TIP Report homepage: <https://www.state.gov/trafficking-in-persons-report/>.
- Hellenic Ministry of Foreign Affairs:
<https://www.mfa.gr/en/foreign-policy/global-issues/trafficking-in-human-beings.html>

10. Further Reading

- Rijken, Conny. *Combatting Trafficking in Human Beings for Labour Exploitation*. Wolf Legal Publishers, 2011.
- European Union Agency for Fundamental Rights (FRA). *Protecting Migrants from Exploitation in the EU: Workers' Perspectives*. Luxembourg: Publications Office, 2019.
- Office of the High Commissioner for Human Rights (OHCHR). *Recommended Principles and Guidelines on Human Rights and Human Trafficking*. United Nations, 2010.
- Nollkaemper, André, and Dov Jacobs. "Shared Responsibility in International Law: A Conceptual Framework." *Michigan Journal of International Law* 34, no. 2 (2013): 359–438.