



Final report

# Study on the collection and improvements of EU Statistics on Trafficking in Human Beings

Client: DG from Migration and Home Affairs  
Brussels, 26 February 2026

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## Abbreviations

<b>EEA</b>	European Economic Area
<b>EFTA</b>	European Free Trade Association
<b>EIGE</b>	European Institute for Gender Equality
<b>EMN</b>	European Migration Network
<b>EU</b>	European Union
<b>EU ATH</b>	EU Anti-Trafficking Hub
<b>Europol</b>	European Union Agency for Law Enforcement Cooperation
<b>Eurostat</b>	Statistical Office of the European Union
<b>FRA</b>	European Union Agency for Fundamental Rights
<b>Frontex</b>	European Border and Coast Guard Agency
<b>GRETA</b>	Group of Experts on Action against Trafficking in Human Beings
<b>GDPR</b>	General Data Protection Regulation
<b>NACR</b>	National Anti-Trafficking Coordinators and Rapporteurs
<b>NGO</b>	nongovernmental organisation
<b>NRM</b>	National Referral Mechanism
<b>THB</b>	Trafficking in human beings
<b>UNODC</b>	United Nations Office on Drugs and Crime

## DISCLAIMER

The EU Anti-Trafficking Hub supports the mandate of the EU Anti-Trafficking Coordinator through providing research, analysis and advice in order to contribute to the development of EU policies, implement the EU Strategy on Combatting Trafficking in Human Beings and the EU Anti-Trafficking Directive, as well as to exchange best practices and reinforce cooperation. The information and views set out in this document are those of the author(s) and do not necessarily reflect the official opinion of the Commission. The findings and recommendations identified in the research products of the EU Anti-Trafficking Hub are independent and do not bind the European Commission. Neither the Commission nor any person acting on the Commission's behalf may be held responsible for the accuracy or the use which may be made of the information contained therein.

## Executive summary

Trafficking in human beings (THB) is a complex crime across the European Union and requires continuous evidence-based responses. Robust and comparable statistical data are fundamental to understanding the scale and evolution of the trafficking phenomenon, and are of key importance to the development and tailoring of policies and interventions against THB both at the EU and at the Member States level. Against this backdrop, the European Commission commissioned this study to take stock of how all 27 EU Member States currently collect, manage, and report statistical data on THB to Eurostat.

The study starts with a comparative mapping of national data collection systems on THB since the transition from the voluntary Eurostat reporting mechanism towards a binding EU-wide framework. It examines national institutional landscapes or organisations that collect and provide data; data coordination models, definitions used (especially those concerning victims, presumed victims, identification, and forms of exploitation), data sources, methodologies, data flows, and existing data-sharing arrangements. It also identifies systemic gaps and operational challenges that hinder the comparison of data or the creation of a coherent EU-level statistical picture.

Findings confirm that Member States have made substantial progress over the past decade, benefiting from the voluntary reporting exercise coordinated by Eurostat, which improved methodological clarity and encouraged greater comparability. However, there are distinct aspects of data collection that can be further improved. For example, divergent definitions and counting practices, incomplete datasets, and fragmented institutional responsibilities pose challenges to the accuracy and comparability of THB statistics. While some Member States have introduced advanced practices such as integrated data systems and unique identifiers – also to prevent double counting - structural, legal, or technical barriers remain across the Member States that hinder systematic and reliable data production.

The study puts forth recommendations which can be considered as avenues for further action at the national level. This includes, for example, the establishment of clear legal mandates, formalised data sharing cooperation structures, and strong coordination mechanisms across all relevant data providers, including civil society organisations and law enforcement agencies. Moreover, ensuring comparability is essential, as even minor deviations in the classification of victims or forms of exploitation can distort EU-level assessments. Furthermore, the implementation of the amended Directive will support Member States in strengthening their national data collection systems and practices.

Overall, this study aims to establish a baseline for measuring progress as the EU moves from voluntary to mandatory annual statistical reporting. By improving data availability, coherence, and reliability, Member States and the EU will be better equipped to understand, prevent, and combat THB, protect victims, and monitor long-term trends.

# 1 Introduction and policy context

## 1.1 Objective and scope of the study

This study was launched to take stock of and evaluate the current practices of (statistical) data collection on trafficking in human beings (THB) across all 27 EU Member States.<sup>1</sup> The study aims to **provide a comparative overview of the statistical data collected, the definitions used, and how each Member State gathers, manages, and reports its THB statistics, and to identify strengths and weaknesses in these systems.** More specifically, the study zooms in on: national systems, data providers and methodologies for data collection, data gaps, limitations, and challenges faced by Member States in reporting data to the European Commission, the institutional landscape of data collection relevant for THB statistics, definitions used, with a focus on the most critical ones such as the definitions used for victims and presumed victims and interpretation of 'identification' and the classification and understanding of forms of exploitation. In doing so, the study provides a situational picture of how Member States approach the new requirements for collecting and providing statistics, as laid down in the **amended EU Anti-Trafficking Directive.**<sup>2</sup>

The principal aim of this study is help improve data collection at the national level by developing an initial baseline of data collection processes and mechanisms at the Member State level, including with a view to improving data availability and data quality at the European level. On that basis, the study offers practical recommendations to improve the coherence and effectiveness of data collection on THB in the EU. Ultimately, the goal is to support the move toward more harmonised, comprehensive, credible and comparable statistics on trafficking – data which, in turn, will enhance Europe's capacity to adjust measures and action to combat traffickers, protect victims, and track progress in this policy area.

It should be noted that this report does not analyse the outcomes and content of the data collected, which are now analysed annually by the Statistical Office of the European Union (Eurostat) and the European Commission. Rather, this study focuses on national systems and methodologies for data collection. Challenges inherent to the nature of data on THB are acknowledged but remain outside the scope of this study.

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<sup>1</sup> While in accordance with Articles 1 and 2 of the Protocol No 22 on the position of Denmark, annexed to the Treaty on European Union and to the Treaty on the Functioning of the European Union, Denmark is not bound either by the Directive (EU) 2024/1712 nor by the Directive 2011/36/EU Denmark was included into the data collection.

<sup>2</sup> Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024.

## 1.2 Policy context

The EU has made the fight against THB a top priority, as reflected in the 2011 **EU Anti-Trafficking Directive**<sup>3</sup>, the **amended 2024 EU Anti-Trafficking Directive** and the **EU Strategy on Combatting Trafficking in Human Beings 2021–2025**.<sup>4</sup> Central to these efforts is the recognition that robust, evidence-based policymaking is needed to tackle THB effectively. This requires a solid empirical understanding of the phenomenon's scope, characteristics and trends in the Member States. Reliable, harmonised and comparable statistical data are essential both at the national and at the EU level for quantifying the scale of THB, monitoring its evolution, assessing the impact of laws, policies and interventions, and identifying where additional efforts are needed.

Over the past decade, the EU has established a framework to gather data on THB across the Union. Since 2013, the collection of THB statistics at the EU-level has taken place voluntarily, with Member States annually submitting data to Eurostat following a common methodology. This voluntary data collection was initiated in response to Article 19 of the 2011 EU Anti-Trafficking Directive, which called on Member States to gather and report statistics on THB to the Commission. Eurostat coordinated this process, providing methodological guidelines to ensure the consistency and comparability of the submitted data. It answered the call for more robust and harmonised data collection across the Member States to create a baseline upon which developments, progress, and trends could be assessed.<sup>56</sup>

It is worth recognising the extent and quality of data collection on THB across the Union in its current shape. Developments since 2013 have led to relatively well-developed data collection and sharing/submission on this specific crime area. Nevertheless, the regular progress reports by the European Commission have highlighted **persistent challenges in achieving comprehensive, harmonised, and reliable statistics**. The First Progress Report<sup>7</sup>, covering 2013–2014 data, reported significant inconsistencies in data submission across Member States, with some failing to provide complete datasets or using divergent definitions. This led the Commission to describe the situation as a “statistical quagmire”, underscoring the difficulty of comparing data and the likelihood of under-reporting.<sup>8</sup>

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<sup>3</sup> Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims of 5 April 2011.

<sup>4</sup> European Commission, EU Strategy on Combatting Trafficking in Human Beings (2021–2025), 2021.

<sup>5</sup> Eurostat, Statistical Working Paper – Trafficking in Human Being, 2013, 2014 and 2015.

<sup>6</sup> European Commission, Evaluation of the Proposal for a Directive of the European Parliament and of the Council amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims, SWD (2022) 427 final, 2022.

<sup>7</sup> Report on the progress made in the European Union in combating trafficking in human beings (First Report), SWD/2016/0159 final, 2016.

<sup>8</sup> Ibid.

Subsequent reports have shown incremental improvements but also ongoing issues. The Second Progress Report<sup>9</sup> noted continued data gaps, particularly concerning offender statistics, with several Member States submitting incomplete or delayed information. The Third Progress Report<sup>10</sup> acknowledged full participation from all Member States for the 2017–2018 period, yet pointed to patchy reporting and under-detection of victims, reinforcing concerns that official figures underestimate the true scale of trafficking. The Fourth Progress Report<sup>11</sup>, which introduced the integration of data into Eurostat’s public database and a shift to (still voluntary) annual reporting, marked a methodological advancement. However, it also highlighted discrepancies in national reporting practices, data volatility, and the disruptive impact of the COVID-19 pandemic on the identification of victims and data collection. Earlier, in 2020, the European Commission also reflected on inconsistencies and gaps in Member States’ data in a dedicated publication on data collection,<sup>12</sup> separate from the progress reports.<sup>13</sup>

The critical **reflections on the quality of data collection methodologies, processes and outcomes were shared by a variety of European stakeholders**, including the Group of Experts on Action against Trafficking in Human Beings (GRETA) of the Council of Europe, who, in their country monitoring reports of the different evaluation rounds, reported that data is often fragmented, incomplete or not readily available.<sup>14</sup> The European Institute for Gender Equality (EIGE) highlighted gender-related data gaps, noting the need for sex-disaggregated data and the need for the data to cover all forms of exploitation.<sup>15</sup> In turn, the European Union Agency for Fundamental Rights (FRA) remarked that significant portions of THB (especially in labour contexts) remain unquantified in official data due to identification and classification issues.<sup>16</sup>

Overall, despite structural improvements, the reports collectively demonstrate that challenges around data completeness, comparability, and methodological consistency have remained a concern. Recognising these persistent gaps in the voluntary system, the EU enforced the legal obligation for Member States to collect and report (statistical) data on THB in a harmonised manner. In June 2024, the European Parliament and Council adopted the **amended EU Anti-Trafficking Directive**, which amends the 2011 Directive in several respects – including a new provision on data collection and statistics. Article 19a of the amended Directive requires all Member States to “ensure that a system is in place” for the recording and production of anonymised statistical data on THB, and to transmit these

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<sup>9</sup> Report on the progress made in the European Union in combating trafficking in human beings (Second Report), COM/2018/777 final, 2018.

<sup>10</sup> Report on the progress made in the European Union in combating trafficking in human beings (Third Report), SWD/2020/226 final, 2020.

<sup>11</sup> Report on the progress made in the European Union in combating trafficking in human beings (Fourth Report), SWD/2022/429 final, 2022.

<sup>12</sup> European Commission, Data collection on trafficking in human beings in the EU, 2020.

<sup>13</sup> As the Fifth Progress Report reflects the situation after adoption of the amended EU Anti-Trafficking Directive, this report is referred to at the bottom of this section.

<sup>14</sup> See [here](#) for a full overview of the reports.

<sup>15</sup> EIGE, Gender-specific measures in anti-trafficking actions: report, 2018.

<sup>16</sup> FRA, Protecting migrant workers from exploitation in the EU: workers’ perspectives, 2019.

data annually to the European Commission. The Directive outlines the minimum scope of data to be collected, which aligns with the indicators already used for Eurostat reporting. This includes, at a minimum:

- **Victims:** the number of registered identified and presumed victims of trafficking (Article 2 offences), disaggregated by sex, age group (child or adult), citizenship, form of exploitation, and by the type of organisation that registered the victim.
- **Perpetrators:** the number of persons suspected of THB, the number of persons prosecuted for THB (with a breakdown by outcome of the prosecution), and the number of persons convicted of THB, all disaggregated by sex, age group and citizenship. Likewise, the number of prosecutorial decisions (charges brought, decisions not to prosecute, etc.) and the number of court judgments (convictions, acquittals, etc.) for trafficking offences must be reported.
- **Related offences:** data on the number of suspected, prosecuted, and convicted persons for the crime of knowingly using services provided by trafficking victims (Article 18a of the Directive), disaggregated by sex and age.

Each Member State must submit its annual data for the previous year by 30 September and, where this is not possible, at the latest by 31 December each year. From 2026 onward,<sup>17</sup> all Member States are required to report a comprehensive set of THB statistics annually. The objective of the provision on data collection and statistics is to improve the completeness, quality, and comparability of the data. The Commission will, in turn, use this data for its policy and reporting purposes. For example, the Directive's Article 19a on data collection and statistics information will feed into the Commission's biennial progress reports on combating THB and into Eurostat's public statistics releases.

The fifth Progress Report was published by the European Commission in 2025<sup>18</sup> and the latest 'statistics explained' by Eurostat<sup>19</sup> include reflections on progress thus far and persisting challenges. These include challenges related to (a) incomplete and uneven reporting across Member States, which hampers comparison over time or between Member States, (b) statistics of some Member States only reflect victims that have been registered by formal authorities, thereby leaving individuals who remain undetected or unreported out of the statistical picture, reporting on the criminal justice statistics related to THB also remains incomplete as some Member States do not report data on suspected and convicted traffickers or report only on the number of prosecutions only, (c) varying degrees of the level of data granularity and breakdown across Member States, including different ways of breaking down variables, thereby hampering comparison. Furthermore, (d) reporting is based on multiple sources and actors, with varying methodologies and standards, and (e) new or evolving forms of exploitation create additional difficulties in detection and standardised data collection and are therefore excluded.

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<sup>17</sup> The deadline for Member States to transpose the new Directive into national law.

<sup>18</sup> Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the progress made in the European Union in combating trafficking in human beings (Second Report), COM/2025/8 final, 2025.

<sup>19</sup> See this link.

It should finally be noted that figures reported upon by the European Commission/ Eurostat and the European Union Agency for Law Enforcement Cooperation (Europol) do not necessarily fully align. Eurostat's official EU statistics (used in reporting of the European Commission) are independent of statistical data provided by Europol, as these latter are based on national figures reported by law enforcement to this Agency. Europol data, in turn, enriches the Commission report by showing broader criminal dynamics and threat assessments, but it is not a numerical statistical series in the report.

### 1.3 Reading guide and terminology

This report is structured as follows. In the next chapter, the methodology for data collection and analysis is presented, including any limitations observed. In Chapter 3, key findings of the study based on the desk research, interviews and surveys are outlined, and Chapter 4 provides conclusions. The annexes, respectively, include the bibliography, the summary of the validation workshop, the overview of self-assessed good practices by Member States, and the case studies.

Furthermore, a couple of key **concepts and considerations on the terminology** in this report are worth noting. Throughout the report, 'representatives of Member States' and 'Member States' are both used when referring to views that national consultants collected in the Member State-level research. It is important to clarify that these statements are collected through interviews and do not necessarily reflect the formal positions of Member States. Furthermore, throughout the report, the definitions of presumed victims,<sup>20</sup> and identified victims<sup>21</sup> are used, which are based on definitions used in earlier EU data reports, as the EU Anti-Trafficking Directive does not provide such definitions. The different forms of exploitation are applied, as embedded in the EU Anti-Trafficking Directive definition (its original version<sup>22</sup> and its extension<sup>23</sup>) are applied.

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<sup>20</sup> A person who has met the criteria of EU regulations and international Conventions but has not been formally identified by the relevant authorities (e.g. police) as a trafficking victim or has declined to be formally or legally identified as trafficked (EMN Glossary).

<sup>21</sup> Identified victim of human trafficking - a person who has been formally recognised as a victim of trafficking by the authority/organisation which is mandated to formally identify victims of trafficking (EMN Glossary).

<sup>22</sup> Exploitation shall include, as a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, including begging, slavery or practices similar to slavery, servitude, or the exploitation of criminal activities, or the removal of organs (Article 2, Anti-Trafficking Directive).

<sup>23</sup> Extension of Article 2 Anti-Trafficking Directive to the exploitation of surrogacy, of forced marriage, or of illegal adoption.

## 2 Methodology

### 2.1 Overview of data collection methods and stakeholders involved

Various data collection methods have been employed throughout the study, including desk research, interviews, surveys, case studies and workshops. This mix of methods has been designed to collect information at various levels (both Member State and European levels) and from a variety of stakeholders, and to generate both qualitative and quantitative insights. The collection of information providing insight about the process, methods, practices and coordination of statistical data collected at the Member State level is a central element of this research. Such information was collected through a survey, desk research, and interviews, with involvement of a team of national consultants, covering all EU Member States. Their inputs were recorded in a structured way, allowing for subsequent cross-Member State comparisons and analyses.

Insights from the different data collection methods have subsequently been triangulated to the extent possible. Given the central role of information gathered at the Member State level, these findings have been pivotal to the triangulation exercise. Findings from other sources have complemented or have been compared against the national insights. Through this data collection and methodology, the study seeks to establish an initial baseline of data collection processes and mechanisms at the Member State level, with a view to improving data availability and data quality at the European level.

#### 2.1.1 Desk research

Desk research was the starting point for the study. The desk research provided the fundamentals based upon which the stakeholder consultation activities (i.e. interviews, a survey and workshops) were designed. Hence, the purpose of the desk research was to obtain an understanding of the current state of play and to take stock of any relevant reports, findings and recommendations, based upon which stakeholder consultations could be designed in a targeted way.

To this end, the desk research was carried out both on the level of each Member State and on a more overarching European level. The former was conducted by the network of national consultants, and the latter by the study team. The Member State desk research served as a natural stepping stone for the interviews (see the next section). The desk research on a more overarching level informed the contextualisation and interpretation of the research findings. Annex I provides a full overview of the documents consulted for each Member State and for the overarching desk research.

#### 2.1.2 Semi-structured interviews

Semi-structured interviews served to validate findings from the desk research, to address any knowledge gaps that persisted after the desk research, and to deepen the analysis. Two types of semi-

structured interviews were conducted, namely on the Member State level and with stakeholders on the EU level.

The **interviews at Member State level** complemented, deepened, and validated the findings from the desk research by providing qualitative insights into the institutional, operational, and legal dimensions of THB data collection processes. In total, 81 interviews have been conducted across 27 Member States. For the majority of Member States, two to three interviews were conducted. The interviews were largely conducted between August and November 2025. They targeted a variety of stakeholders, including the national statistics agency, ministries, law enforcement agencies, the public prosecutors' office, civil society organisations, and rapporteurs or monitoring bodies, next to anti-trafficking coordinators.

The following visual illustrates a breakdown of the type of interviews conducted across the Member States.

Figure 1 - Type of stakeholders interviewed in the Member States (N = 816)



**The EU-level interviews** provided a cross-cutting institutional perspective on the collection, coordination, and use of data on THB. These fuelled the understanding of how EU institutions and agencies define data requirements, what they expect from Member States and how they support them. Furthermore, the EU-level interviews provided insights into how comparability is ensured and into ways to identify systemic challenges or opportunities for improvement. The EU-level interviews complemented the comparative analysis and the interpretation of the findings flowing from the Member State-level research. In total, three EU-level interviews were carried out. These included an interview with Eurostat, Europol and the European Border and Coast Guard Agency (Frontex).

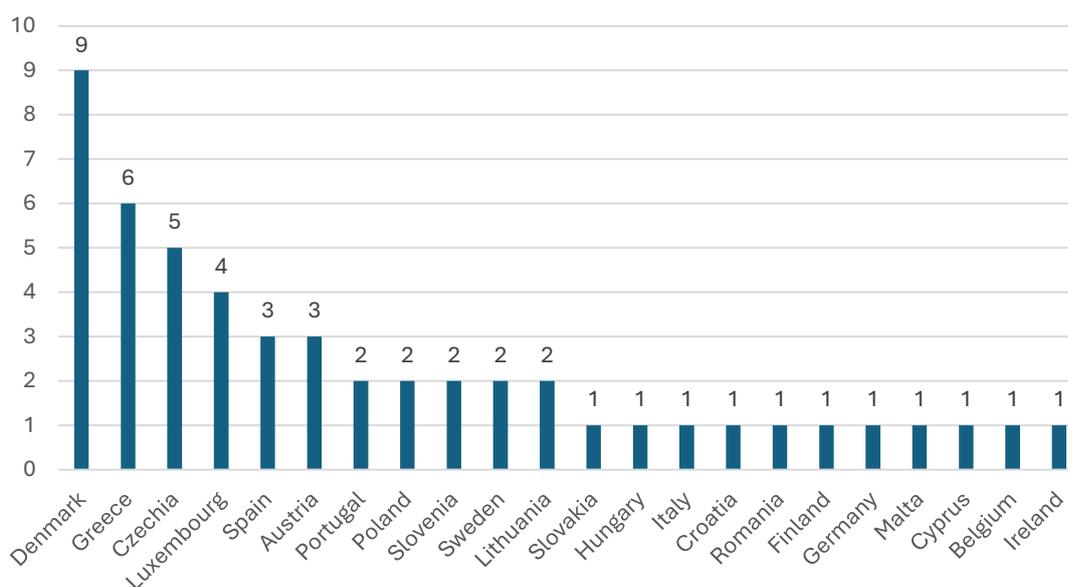
### 2.1.3 Survey among stakeholders supporting THB data collection

The objective of the survey was to obtain insights from **other relevant actors beyond those targeted in Member State-level interviews**. From these additional stakeholders, the survey collected information, experiences, and perceptions on national practices related to the roles and responsibilities of different actors, as well as the challenges, lessons learnt, and recommendations. Besides enabling the collection of views from a wide range of stakeholders, the survey also helps quantify some elements of the study. This includes, for example, the number and types of stakeholders involved and

systems in place. As such, survey findings inform the overall analysis and serve as a method of triangulating information.

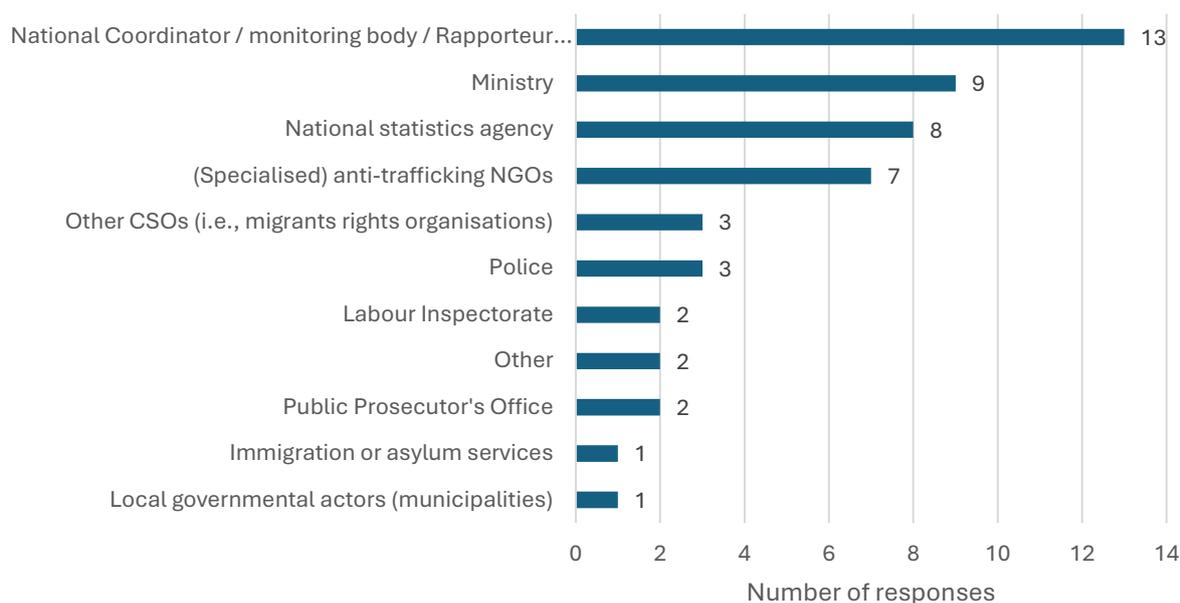
The survey was launched in August and remained open until 15 October 2025. The link to the survey was disseminated through the National Anti-trafficking Coordinators and Rapporteurs (NACR). In total 51 replies were received from 21 Member States. Most of the replies were received from Denmark, Greece and Czechia. The following visual illustrates the number of responses received per Member State.

Figure 2 - Number of responses per Member State (N = 51)



Responses to the survey were provided by different stakeholder types, with the majority coming from national coordinators / monitoring bodies / rapporteurs and ministries (see also the section on challenges and limitations), the national statistics agencies and specialised NGOs.

Figure 3 - Number of responses per stakeholder type (N = 51)



The high number of responses from national coordinators, rapporteurs and other monitoring bodies is because some NACR – which were tasked with disseminating the survey to stakeholders active in collecting data on THB in their respective Member States - also responded to the survey themselves, in addition to being consulted through semi-structured interviews by national consultants. Hence, the views of the NACR are, in some instances, recorded twice. This should be taken into consideration. To the extent possible, these duplications have been corrected for in the analysis of findings.

#### 2.1.4 Case studies

Two case studies have been developed to present **concrete practices by Member States** that can serve as an orientation for other Member States. Case study 1 focuses on cooperation and the collection of data from all relevant stakeholders at the national level. Case study 2 concentrates on practices for avoiding double-counting in the collection of THB statistics in the EU. Each case study singles out a selection of practices and provides a description of the practices' features, added value and opportunity for transferability. This information is provided in a structured format, inspired by the European Commission's Better Regulation Guidelines (problem definition, objective, input, output, impact):

- A description of the issue or **problem** that underpins the case study topic (i.e. what is the issue at hand, why is this an issue, what is the impact on the collection of statistics, who is involved, etc);
- An introduction to the three different types of practices (i.e. the **objective** of the type of practice);
- A description of the different practices that can be grouped under each type of practice (i.e. what does the practice entail, what does it do, which actors are involved, how does it help the cooperation (**output**), their strengths and added value and their limitations (**impact**).

The case studies are developed based on the national research. The full case studies are provided in Annex IV and Annex V. The findings of the case studies are integrated throughout the research report.

### 2.1.5 Workshop with National Anti-trafficking Coordinators and Rapporteurs

Two workshops were organised, with participation from the NACR and representatives of national statistical agencies. The purpose of the **first workshop**, held in September 2025, was to provide a clear overview of the study's aim, scope, and methodology, including the research methodology and the timeline for its implementation. This workshop also provided an opportunity for participants to share their views on the challenges they experienced in collecting statistics at the Member State level and offer suggestions for the case studies. Over 70 participants attended the online workshop. In particular, the data collected through the interactive tool Mentimeter provided useful insights into the challenges that the NACR observes and provided input for the case studies.

A **second online validation workshop** with NACR and national statistics agencies) was held in January 2026. In total, over 80 participants attended the online validation workshop, which provided them with the opportunity to share reflections on the draft findings of the study, including the degree to which they recognised the findings presented. The participants were also invited to share reflections on the draft recommendations presented. The workshop proved to be a useful opportunity to validate findings, test recommendations with a view to ultimately enhancing the accuracy and relevance of the analysis and reporting. Annex II provides a succinct summary of the workshop results.

## 2.2 Methodological limitations

A selection of the methodological challenges and limitations is worth highlighting:

- For various reasons, not all **national consultants could conduct the planned three interviews** in the limited timeframe. In these cases, the Member State research was based on a smaller number of interviews, desk research and expert knowledge of the national consultants.
- Regarding the case studies, it is worth noting that the scope of this study **does not allow for a rigorous assessment of the effectiveness of the practices**. It is, therefore, difficult to classify the practice as 'good'. We, therefore, speak of 'practices' and describe the practice's features, advantages and disadvantages within the scope of this study. As part of the data collection at the Member State-level, stakeholders have been asked to share good practices in their respective Member State, both via the interviews and the survey. These suggestions are provided in Annex III, but it should be noted that these practices have been supplied by Member States' stakeholders and have not been independently assessed as 'good' practices by the study team.
- Furthermore, the study assesses the Member State practices from a national perspective, thereby **dedicating only limited attention to potential overlaps in data across Member States** (i.e. Member State A might also track their nationals that have been assisted in Member State B, while these individuals might also be in Member State B's data).
- **New developments in THB policy** and legislation, both at EU and national levels (e.g. the transposing by Member States of the 2024 revision of the EU Anti-Trafficking Directive and or

transposing of other EU law like the EU Migration and Asylum Pact), have played a role in the data collection efforts and findings of this study. For example, Member States must now also collect data on other forms of exploitation added to the definition in the Directive (Article 2), as well as on the new criminalisation of the knowing use of services by trafficked persons (Article 18 paragraph (4)). Moreover, taking stock of practices proved challenging in some Member States that are undergoing reform, such as Romania, where responsibilities are being transferred to another Ministry. Similarly, in Ireland, the National Referral Mechanism (NRM) is currently being aligned with the EU Migration and Asylum Pact, which might render the information gathered for this study, as well as recommendations made, outdated later.

## 3 Key findings

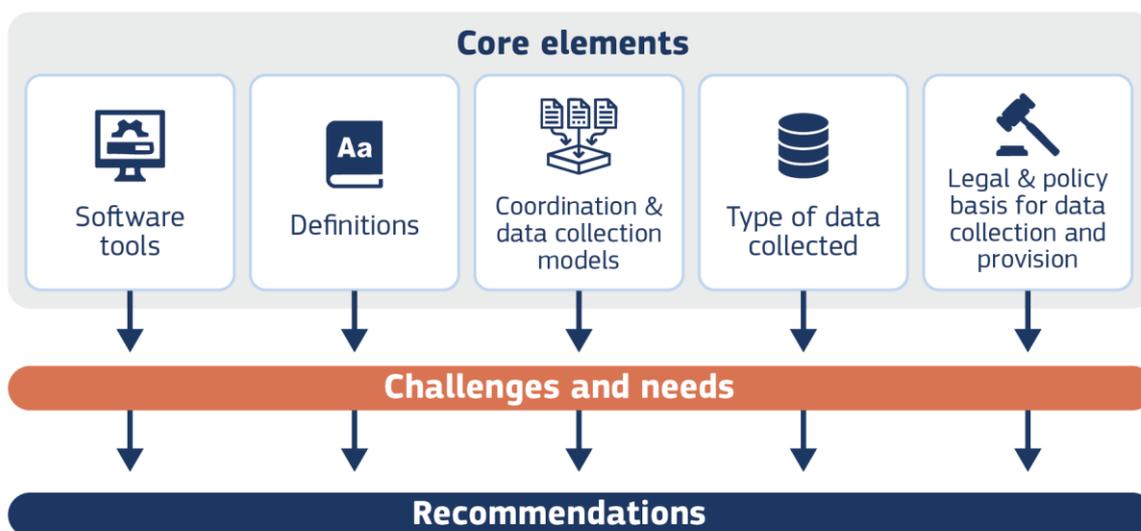
This chapter consists of three parts. First, an overview of the key findings is provided, including the main elements of the analysis and their relevance to the study, as well as overall observations. The second part of this chapter delves deeper into the different elements, the specific findings and nuances, as well as the identified challenges, recommendations, lessons learnt and good practices. This chapter concludes with a section on challenges, needs and identified recommendations.

### 3.1 Overview of key findings

The amended EU Anti-Trafficking Directive requires Member States to collect and report statistical data on THB to the European Commission on an annual basis. This should be done in a harmonised way along the indicators set in Article 19a of the Directive. EU Member States should comply with the new requirements by 15 July 2026, which is expected to ensure further harmonisation. The current **practical reality, as of now, which the research analysed, still differs across Member States.**

To better understand and assess the data collection practices and systems, as well as their quality in the Member States, five essential elements of THB statistics were assessed. The figure below shows the overview of the elements covered in the analysis. A summary of the key findings is provided below the figure.

Figure 4 - Overview of the study elements



**Definitions** form the basis for a common understanding among relevant stakeholders regarding THB and impact what kind of data is collected and how it is carried out in practice. There are differences in the (application of) definitions of "identified" and "presumed" victims, as well as discrepancies between the data collected at the national level and the data reported to Eurostat. While in many EU countries data on both presumed and identified victims is collected, not all Member States report or share this data to Eurostat, with some only reporting formally identified victims.

**The coordination and data collection models** establish the framework for the type and number of actors involved in collecting THB statistics. This can impact both the data collection process and statistics in Member States, as well as the cross-border exchange of information in various ways. Streamlined and centralised coordination and data collection models facilitate the inclusion of relevant stakeholders in providing data. Fragmented models, on the other hand, hinder effective cooperation among relevant data providers within Member States or affect the coordination of data collection and leave room for oversight or exclusion of data on different types of THB or data from indirectly relevant stakeholders.

**The type of data collected** directly feeds into the quality and comparability of data within and across Member States. Member States generally collect data on various characteristics (such as sex, age, citizenship, and form of exploitation) of both victims and offenders, as required under the amended Directive. However, as there are differences across national stakeholders, whereby they do not always all collect data on all requested characteristics, some Member States are not able to provide this data for all victims or perpetrators. Furthermore, sometimes different data reporting categories are used, which renders comparability across Member States difficult. Forms of exploitation are widely recorded by Member States, but data gaps emerge, considering some forms of exploitation or the use of an "other" category. It has also been highlighted that offender data is often not specified on the form of exploitation. As some data registration forms lack certain exploitation options, data providers record all these cases under "other" (e.g. forced begging and forced criminality). This could lead to less oversight, underreporting, and/or miscategorisation of victims. Moreover, without a comprehensive understanding of the situation, it is not possible to develop informed national-level policies.

In addition, the newly added forms of exploitation (exploitation of surrogacy, of forced marriage and or of illegal adoption) are not yet included as options in data registration forms or are not yet recorded.

**The legal and policy basis sets the framework for data collection and provision** for stakeholders at the operational level. This often includes a mix of criminal law, statistical law, and data protection regulations, depending on the national context. There are general legal mandates in Member States for the collection and recording of THB data. However, the exchange of data and information, both nationally and cross-border, may be hindered due to the strict interpretation and application of data protection rules and regulations and/or a lack of awareness on how data can be exchanged within the legal remit.

**Software tools** used for collating and analysing THB statistics contribute to cleaner and more harmonised data. Different types of software tools are used, ranging from more common ones, such as Excel and SPSS, to more specialised tools, including automated data generation and secure centralised systems. Most notably, software tools (e.g. unique personal identifiers and algorithmic checks) aim at addressing the double-counting of victims, which directly contributes to the completeness and accuracy of THB data. However, many of these accuracy checks are still conducted manually or through multi-stakeholder exchanges, which can be resource-intensive.

Across these five elements of analysis, **different types of challenges have been identified**. These are further analysed and categorised into legislative, governance, methodological and technical challenges. This facilitates the identification of needs and corresponding recommendations, allowing for avenues of targeted action at both national and EU levels (see section 3.3).

## 3.2 Findings explained in detail

This section provides an introduction to each element of the analysis, followed by an elaborated account of the findings. Reflections on the impact of these findings on the availability and quality or reliability of data are presented in the final paragraph.

### 3.2.1 Definitions

Article 19a of the Anti-Trafficking Directive requires EU Member States to ensure that a system is in place for the recording, production and provision of anonymised statistical data to monitor the effectiveness of their systems to combat offences referred to in this Directive, and defines which statistical data should be available at the central level. This includes statistical data on the number of **registered identified** and **presumed** victims of the trafficking offence(s) described in the Directive, disaggregated by sex, age groups, citizenship, and **form of exploitation**, as well as the similar disaggregated data on the number of persons **suspected**, **prosecuted**, and **convicted** for these offences.

The 2011 EU Anti-Trafficking Directive **does not provide an explicit definition of a victim of human trafficking**; instead, it defines the offence of trafficking in human beings and what protection and assistance measures should be provided for a victim of this crime. Under EU law and practice a victim is: 'any person who has been subjected to the offences concerning trafficking in human beings, as defined in Article 2 of the Directive, which involves the 'recruitment, transportation, transfer, harbouring or reception of persons, including the exchange or transfer of control over those persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of

exploitation<sup>24</sup>. The **Directive does not provide for definitions for ‘registered identified and presumed’ victims** but solely refers to these terms.

This leaves room for interpretation on the Member States’ end. The definitions provided by the European Commission in earlier reports on THB data collection, which are reflected in the Eurostat Guidelines and practice, provide guidance but are not binding (see textbox below).

The **first statistical data report the European Union published on human trafficking statistics** was issued by **Eurostat together with the European Commission’s Directorate-General for Home Affairs in 2013**. This report<sup>25</sup> presented, for the first time at EU level, harmonised statistics on human trafficking covering the years **2008, 2009 and 2010** from all EU Member States, as well as some candidate and EFTA/EEA countries at the time. It included data on **identified and presumed victims** by age, gender, citizenship and form of exploitation, as well as statistics on suspected, prosecuted, and convicted traffickers. This statistical working paper was followed by the 2014 edition (updated in 2015) covering the periods 2010 and 2011. This second report and all reports published afterwards make a distinction between identified and presumed victims.

**Definition used by the European Commission / Eurostat for registered victims:**

According to the **Eurostat Guidelines**, a **registered** victim is a person who has been **formally** identified as a victim of trafficking in human beings by the relevant formal authority in a Member State; or a victim who has met the criteria of the EU Anti-Trafficking Directive **but has not been formally** identified by the relevant formal authority as a trafficking victim or who has declined to be formally or legally identified as trafficked.<sup>26</sup>

Victims are considered ‘identified’, when they have been formally identified as victims of trafficking in human beings by the relevant formal authority in Member States’, that is to say, after a process that establishes that they are victims; often, but not always, involving law enforcement. ‘Identified’ and ‘presumed’ victims are referred to together as ‘registered victims’<sup>27</sup>

With regard to forms of exploitation (purpose), **the Directive provides a non-exhaustive list and defines the following forms of exploitation**: the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, including begging, slavery or practices similar to slavery, servitude, or the exploitation of criminal activities, or the removal of organs (Article 2). The

<sup>24</sup> Based on Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims and Directive 2012/29/EU on Victims’ Rights.

<sup>25</sup> EU – First Human Trafficking Statistical Data Report – Eurostat, Date: October 7, 2013  
[a6ba08bb-c80d-47d9-a043-ce538f71fa65](https://ec.europa.eu/eurostat/cache/metadata/en/crim_thb_esms.htm)

<sup>26</sup> Eurostat, 2024, Crime and criminal justice statistics – Methodological guide for users – 2024 edition.

<sup>27</sup> [https://ec.europa.eu/eurostat/cache/metadata/en/crim\\_thb\\_esms.htm](https://ec.europa.eu/eurostat/cache/metadata/en/crim_thb_esms.htm)

amended Directive has extended this list by adding the exploitation of surrogacy, of forced marriage or of illegal adoption.

In view of this, the focus of the analysis, therefore, lies explicitly with the definitions of **registered 'identified' and 'presumed' victims**, as well as the **forms of exploitation** covered by their data collection and/or embedded in national laws. More concretely, the following aspects have been analysed:

- Whether Member States apply the definitions of registered 'identified' and 'presumed' victims as provided by the European Commission/Eurostat in their data registration;
- The impact of the definition on if and how data is included in the national data collection and or shared with Eurostat;
- Any inconsistencies in the use of definitions across stakeholders on the Member State level and their impact on the data quality.

The following paragraphs present these findings, first regarding registered 'identified' victims, then 'presumed' victims, subsequently, the impact of the diverging definitions on collecting and reporting statistics, and finally, the forms of exploitation.

### Formally identified victims

Research shows that 22 Member States<sup>28</sup> **apply the European Commission/Eurostat definition** of a formally identified victim.

Out of these, three Member States<sup>29</sup> report that they apply this definition with the inclusion of presumed victims, while others (e.g. Austria, Bulgaria, and Greece) apply the definition more strictly.<sup>30</sup> Representatives of five Member States<sup>31</sup> indicate that their definitions differ from the Eurostat definition:

**Belgium** reports on victims who have entered the 'victim protection and assistance procedure', using data from three government-approved specialised centres for victims of THB. Most of these victims have been formally identified by the public or labour prosecutor, who are the only ones in Belgium competent to formally identify victims of THB. However, some have not yet been formally identified

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<sup>28</sup> Respondents from the following Member States confirmed to apply the definition of formally identified victim as per Eurostat/European Commission: Austria, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, France, Germany, Greece, Hungary, Italy, Latvia, Lithuania, Luxembourg, Malta, Poland, Portugal, Romania, Slovenia, Spain, and Sweden.

<sup>29</sup> Belgium, Finland and the Netherlands.

<sup>30</sup> e.g. in Greece, only individuals who have been officially recognised as victims of human trafficking by the Public Prosecutor's Office are recorded and reported.

<sup>31</sup> Belgium, Finland, Ireland, the Netherlands, and Slovakia. Ireland and Slovakia stated not to apply the definition and that their definitions differ, but from the additional information provided by the national consultants, they seem to apply the definition of identified victims. In Slovakia, an "identified victim" is someone formally recognised by the police unit responsible for combating irregular migration. The victim's formal identification is necessary to access the support programme, which is different from the more general definitions used in other countries.

but have already been ‘informally identified’ or ‘pre-identified’ - by either one of the three government-approved specialised centres for THB victims, or by law enforcement ] - and are included in the national statistical data on victims.

**Finland** considers a victim as being formally identified when they are accepted as a client by the specialised services (NAS). NAS includes those who are presumed victims and who need services. However, those without a need for services, for whom there might be a presumption of THB, will not be formally identified, as Finland has no process outside the NAS for formal identification.<sup>32</sup> Information regarding which of the trafficking victims that are included in the data have been formally identified and which have not been formally identified cannot be extracted from the data.

In the **Netherlands**, there is no designated identification authority. Here, all presumed victims are included in the data provided to Eurostat, and only some of them may be granted access to the reflection period and/or a temporary stay on the basis of indications of their victimhood, while their access to services and stay largely depend on the initiation or outcome of legal procedures.

Finally, representatives of **Slovakia** indicated that a different definition is used. However, like the Member States that do apply the definition, Slovakia differentiates between a formally identified victim of trafficking (i.e. a person who has been formally recognised as such by the competent authority, namely the specialised police unit – the National Unit for Combating Illegal Migration of the Bureau of Border and Alien Police (NJBPNM), which is the gateway to accessing the state-run Programme for Support and Protection of Victims of Human Trafficking) and a presumed victim (i.e. a person whom NGOs or other referral actors have proposed for inclusion in the Support and Protection Programme, based on trafficking indicators, but who has not yet been formally identified by the police).<sup>33</sup>

Representatives of only five Member States confirmed that this definition is also formally embedded – or soon to be embedded - in legislation,<sup>34</sup> while representatives of only one Member State (Belgium)

<sup>32</sup> Act on the Reception of Persons Applying for International Protection and on Identifying and Assisting Victims of Trafficking in Human Beings, “the Reception Act”, Chapter 4, Section 35.

<sup>33</sup> In Slovakia, the legal basis for the victim definition and the procedures governing identification are set out in Ministry of the Interior Order No. 161/2020 on the Support and Protection Programme. The definition and procedures are likewise governed by Ministry of the Interior Order No. 161/2020.

<sup>34</sup> Austria, Bulgaria, Estonia, Greece and Ireland. In Austria, the definition of an identified victim is based on the general provisions of the Code of Criminal Procedure (Strafprozessordnung – StPO). According to § 65 StPO, a victim is a person who has been directly affected by a criminal act. In Bulgaria, this is defined in the Bulgarian Mechanism for referral and support of victims of human trafficking (NRM). Greece refers to Laws 3386/2005 and 3875/2010, as well as the relevant ministerial decisions that define the victim identification process. In Estonia, an identified victim: a person who is a victim in a criminal proceeding initiated for trafficking-related offences under the Penal Code (e.g. § 133–133<sup>3</sup>, 138–140, 175). This is the formal identification threshold used for justice-sector statistics and matches Eurostat’s point (1). The legal basis is the Victim Support Act § 4(3), which defines a “victim of human trafficking” by reference to criminal proceedings on those provisions. In Ireland this is forthcoming: Section 31(3)(a) of the Criminal Law (Sexual Offences and Human Trafficking Act, introduces the use of the term ‘identified victim of human trafficking’. This part of the Act has yet to be enacted. (See Appendix A1 on the Forthcoming Revised National Referral Mechanism for impending process). It should be noted that ‘registered victims’ include persons who are presumed victims of trafficking and persons who are identified victims of trafficking (Cunniffe, E. & Ayodele, 2022: 21).

explicitly mentioned not having such a legal definition, highlighting that a clear legal text defining "identified" or "presumed" victims is absent in the country.

### Presumed victims

The findings show that at least 17 Member States<sup>35</sup> **apply** the definition of a presumed victim. Representatives of ten Member States<sup>36</sup> indicated that they do **not apply** the definition of presumed victim. Whether these Member States also include data in their statistics in their national data collection system and/or share this data with Eurostat differs; see the table below. It is unclear how many of these Member States have the definition of a presumed victim formally embedded in national legislation or policies; therefore, this finding is primarily based on the assessment by national consultants.

### Collecting and reporting data on identified and presumed victims

Member State practices regarding the collection and reporting of data on identified and presumed victims differ. Practices differ regarding (1) whether they (formally) collect data on presumed victims, who are assisted by NGOs or in more general social support programmes and (2) whether this data is then included in the central database and becomes part of official statistics or whether (3) only formally identified cases are reported to Eurostat.

**At least fourteen Member States only report formally identified victims to Eurostat<sup>37</sup>** and exclude presumed victims, regardless of whether this data is collected in the country. Again, some differences are observed. Some Member States are more restricted in their application of what 'formally identified victims' means and register only those identified in criminal procedures. Other Member States use a slightly wider approach and include those who, for example, law enforcement identified as presumed victims based on the slightest indications, while these persons are formally not yet in the criminal justice system.

In **at least five Member States<sup>38</sup> (specialised) anti-trafficking NGOs can add data on presumed victims** or are authorised to carry out some form of identification. This is the case in, for example,

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<sup>35</sup> Bulgaria, Cyprus, Estonia, Finland, France, Germany, Greece, Italy, Lithuania, Luxembourg, Malta, the Netherlands, Portugal, Romania, Slovakia, Slovenia and Spain. For Ireland, it was indicated that it does not apply the definition but uses the term 'potential victims' instead. However, the definition for potential victims used is quite similar to the provided definition of a presumed victim (i.e. Potential victim of trafficking is defined as a person whom people think is a victim of trafficking but who has not been fully assessed to be a victim by the Gardaí (police). A person who is a potential victim of trafficking will be able to avail of some supports and will not be removed from Ireland while the Gardaí are assessing if there are reasonable grounds to believe they are a suspected victim of human trafficking' (DOJE, 2015: 28). Forthcoming: Section 31(1)(a) of the Criminal Law (Sexual Offences and Human Trafficking Act, enshrines the use of the term 'presumed victim of human trafficking'. This part of the Act has yet to be enacted. (See Appendix A1 on the Forthcoming Revised National Referral Mechanism for impending process).

<sup>36</sup> Austria, Belgium, Croatia, Czechia, Denmark, Hungary, Ireland, Latvia, Poland and Sweden.

<sup>37</sup> Austria, Bulgaria, Croatia, Czechia, Denmark, Ireland, Lithuania, Malta, Poland, Romania, Slovakia, Slovenia, Spain, and Sweden.

<sup>38</sup> Belgium, Germany, Hungary, Italy and Latvia report that others (specialised NGOs) can also identify victims, and it seems this data is added to the formal registration. In Greece, this is also possible, but the formal data reported

Belgium, where three specialised service centres are also designated to identify victims. Hence, the data that these Member States register on victims and report to Eurostat includes those identified by these organisations and/or victims who are accepted in support and assistance programmes.

**Most other Member States also collect data on presumed victims. Still, in this case, the data is excluded from the formal statistics or, at the very least, not shared with Eurostat, but might appear in national reports.** For example, reports of the number of persons assisted in special support programmes or by the NRMs are shared with National Rapporteurs, an Ombudsman or other similar bodies for status/services reports, but this data is not shared with Eurostat. To illustrate, in **Czechia**, presumed victims are reported by NGOs, but this data is included only in reports on "services provided by NGOs", not in official Eurostat statistics. Also in **Slovakia**, the data on presumed victims is used for admission to the Support and Protection Programme but not extended to broader Eurostat reporting. The table below provides more information per Member State.

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excludes these persons; as such, Greece uses a more narrow and strict approach. In Germany, in practice, data collection efforts leverage the definition to include cases confirmed by authorities as well as cases where trafficking is suspected but not yet formally confirmed, allowing for a more complete understanding of trafficking phenomena within the Member State. Hungary indicated that NGOs can also add persons to the system (and access EKAT). Italy indicated that given the specific nature of the national identification process in Italy—where specialised anti-trafficking organisations are authorised to carry out formal identification— the definition of "formally identified victims" also includes those identified by these organisations. In Latvia all victims who have been identified through either the formal approach or the social approach are considered and included in the statistics as identified victims. In Latvia and Italy for example this is done through the so-called 'social path or social approach, even though these are not governmental authorities, and there is only a presumption of victimhood'.

Table 1 – Overview of definitions applied and data collection methods per Member State

<b>Member State</b>	<b>Collects data on both formally identified victims and presumed victims</b> (not necessarily at a centralised level) <sup>39</sup>	<b>Reports only formally identified victims to Eurostat<sup>40</sup></b>	<b>Reports both formally identified and presumed victims to Eurostat</b>	<b>Notes</b>
<b>Austria</b>	✓		✓	Specialised victim support organisations collect and report data on all persons to whom they provide services — regardless of whether they have been formally identified by the police as victims of trafficking. This data is shared with the authorities, and these statistics are included in Austrian national reports submitted to Eurostat. Hence, the reported data does not clearly distinguish between "presumed victims" and "identified victims".
<b>Belgium</b>	✓		✓	The data provided by Belgium to Eurostat includes data on all victims who enter the 'victim protection and assistance procedure'. Most of them have been formally identified by the public or labour prosecutor, who are the only competent authorities to formally identify THB victims. However, some have not yet been formally identified but have already been 'informally identified' or 'pre-identified' by either one of the 3 government-approved specialised centres for THB victims, or by law enforcement.
<b>Bulgaria</b>	✓	✓		In Bulgaria, official statistics include only formally identified victims, i.e. those recognised through law enforcement and judicial procedures. Victim numbers are drawn from the Prosecution Service (BKП) database, which records cases only once a victim has been constituted in proceedings. This approach avoids double counting but excludes victims who are not taken forward in the justice system. Presumed victims identified by NCCTHB administration, NGOs, social services, or local commissions are not systematically integrated into the National Commission's database. These cases may appear in annual reports of the National Commission or NGOs but are not part of the official national statistics transmitted to Eurostat.

<sup>39</sup> This column includes both data collection done by the governmental actors as well as by NGOs. Where information is available, it is indicated if NGOs (only or also) collect this data.

<sup>40</sup> This column includes Member States that indicated that among this group there might be some victims that were not yet formally identified but only identified by NGOs that are authorised to identify reasonable grounds.

<b>Member State</b>	<b>Collects data on both formally identified victims and presumed victims</b> (not necessarily at a centralised level) <sup>39</sup>	<b>Reports only formally identified victims to Eurostat<sup>40</sup></b>	<b>Reports both formally identified and presumed victims to Eurostat</b>	<b>Notes</b>
<b>Croatia</b>		✓		Only formally identified victims of THB by the Ministry of Internal Affairs/Police in cooperation with the NGO and Red Cross or the Operational Team for the Suppression of Human Trafficking are included in the official statistics kept in the office of the national coordinator.
<b>Cyprus</b>	✓		✓	In Cyprus, both categories of 'presumed' and 'identified' victims are recorded distinctly and separately. The body responsible for the official identification of victims of trafficking is the police anti trafficking unit, and, as such, they are the only body that will have the complete official statistics regarding both 'identified victims' and the 'presumed victims'. Referrals of presumed victims can be made to the police from numerous sources, including social welfare services, the labour office, CSOs and individual reports by way of calls to the hotline.
<b>Czechia</b>	✓	✓		Non-governmental organisations identify victims who are unwilling or unable to participate in the formal Ministry of Interior Programme; they are considered as potential or unidentified victims or victims who preferred not to cooperate with police. These victims are in the statistics of NGOs and are shared with the National Rapporteur for the Status Reports but feature only in the "provided services by NGOs" sections and not in the official statistics.
<b>Denmark</b>	✓ (NGOs only)	✓		Presumed victims are not part of the statistical data, and Denmark does not operate with reference to the criteria in the Directive. A person must be identified to receive an offer under the Danish National Action Plan.
<b>Estonia</b>	✓	✓		Registered victims used for Eurostat are those in proceedings (identified). Presumed victims identified by SKA are recorded for service management and monitoring (e.g. notifications submitted) but are no longer counted in the 'registered victims' figure.
<b>Finland</b>	✓		✓	While a NAS admittance decision is the only process for formal identification as a victim of THB according to the national legislation referred to above, the NAS admittance threshold ("possibly be a victim of trafficking in human beings based on the circumstances of the case") more closely resembles the definition of a presumed victim. On the contrary, even if reported victim data were extracted from data entered into the AIPA system by the courts, even in cases in which a court issues a judgment finding the defendant guilty of THB, the plaintiff in the case

<b>Member State</b>	<b>Collects data on both formally identified victims and presumed victims</b> (not necessarily at a centralised level) <sup>39</sup>	<b>Reports only formally identified victims to Eurostat<sup>40</sup></b>	<b>Reports both formally identified and presumed victims to Eurostat</b>	<b>Notes</b>
				would not be considered formally identified according to current legislation, even though this might be considered a strong confirmation of THB victim status.
<b>France</b>	✓	✓		In France, “presumed victims” reported by NGOs are included in separate surveys but not in official police or justice statistics.
<b>Germany</b>	✓		✓	In Germany, the inclusion of victim data in official trafficking statistics reflects a practice that incorporates both formally identified victims and presumed victims. Because presumed victims may be granted this reflection period even before formal identification, they are included in the data collection and reporting frameworks that inform national statistics. Practically, this means victim data in official statistics includes those in the reflection period, who may be counted as registered victims under the Eurostat definition, even if formal identification has not yet occurred.
<b>Greece</b>	✓	✓		In Greece, both recognised and presumed victims of THB are recorded in the NRM/EMA. Recognised victims have been officially identified as victims of THB by the relevant authorities. Presumed victims meet the criteria of the Directive but have not undergone the formal recognition process or have declined formal identification. Both are recorded, which provides a more comprehensive overview of THB and increases the number of victims included in national statistics. However, the number of presumed victims is not included in the data provided to Eurostat. Only the victims officially recognised by the Public Prosecutor's Office are then included.
<b>Hungary</b>	✓		✓	In Hungary, only identified victims are officially registered in the EKAT system. However, presumed victims may be registered in separate systems run by, for example, NGOs (who voluntarily contribute to the identification of victims) or the OKIT helpline centre, since the OKIT does not register victims directly into the EKAT, but only registers them within their own system.
<b>Ireland</b>	✓	✓		The National Rapporteur/IHREC (2022a, 182; 2024: 375) publishes data from some statutory bodies and some Civil Society Organisations on presumed victims of trafficking. However, these are not considered to be official statistics and are not included in official statistics.

<b>Member State</b>	<b>Collects data on both formally identified victims and presumed victims</b> (not necessarily at a centralised level) <sup>39</sup>	<b>Reports only formally identified victims to Eurostat<sup>40</sup></b>	<b>Reports both formally identified and presumed victims to Eurostat</b>	<b>Notes</b>
<b>Italy</b>	✓		✓	In the Italian system, both identified and presumed victims are registered. Within the anti-trafficking system in particular, specialised operators collect data on all individuals encountered during outreach, drop-in and legal counselling activities. Consequently, a high number of individuals are identified as presumed victims of trafficking.
<b>Latvia</b>	✓		✓	In Latvia, victims are distinguished between those identified by the State Police (who are also recognised as victims within criminal proceedings), which is the formal approach, and those identified by specialised NGOs through a commission decision, which is the social approach. In both approaches, identification takes place in accordance with the regulatory framework, meaning that the legal framework also grants NGOs the right to identify victims. Statistically, this distinction is not made; all identified victims are compiled and recognised as “identified” victims. The police would prefer that formally identified victims (recognised within criminal proceedings) be separated, and in the view of the police, victims identified by NGOs are “presumed” unless criminal proceedings for THB are initiated. The term “presumed victims” does not appear in the statistics, as this category is not defined in the regulatory framework.
<b>Lithuania</b>	✓	✓		In Lithuania, the annual review of the situation of THB, prepared by the Seimas Ombudsperson’s Office, reports on both presumed victims of THB and identified victims.
<b>Luxembourg</b>	✓		✓	There is a clear distinction made between identified and presumed victims, but it seems that when victims are not yet formally identified but already referred to the prosecution service, these are included in the data provided.
<b>Malta</b>	✓		✓	In Malta, presumed victims: individuals who have not been formally/legally identified or have declined to be legally identified are included in official statistics due to FSWS’s datasets, as they mainly deal with offering support to victims of trafficking. This comes with the limitation of not capturing any individual who has not approached FSWS. Thus, any individual not within these two datasets is not counted within official statistics. The police do not distinguish between presumed or registered, which means that if they are presumed, they might not be included in the police data. If the police presume that someone is a victim, they will strive to register them.

<b>Member State</b>	<b>Collects data on both formally identified victims and presumed victims</b> (not necessarily at a centralised level) <sup>39</sup>	<b>Reports only formally identified victims to Eurostat</b> <sup>40</sup>	<b>Reports both formally identified and presumed victims to Eurostat</b>	<b>Notes</b>
<b>Netherlands</b>	✓		✓	All victims detected, whether by law enforcement or NGOs, are reported and included in the national register; all are presumed victims, based on the slightest indications.
<b>Poland</b>	✓	✓		In Poland, only formally identified victims are included in the official statistics. This means that presumed victims who have not yet been confirmed through legal proceedings or prosecutorial recognition are not reflected in the national figures
<b>Portugal</b>	✓		✓	Portugal includes both identified victims and presumed victims in its statistics.
<b>Romania</b>	✓		✓	In Romania, all victims (identified and presumed) are included in the official statistics.
<b>Slovakia</b>	✓	✓		In Slovakia, the distinction between “identified” and “presumed” victims directly shapes the scope of official trafficking statistics. An identified victim is someone formally recognised by the specialised police unit (NJBPNM) or admitted into the Ministry of the Interior’s Support and Protection Programme. Data on such victims are entered into the Trafficking in Human Beings Information System (THB IS) and appear in national statistics. Presumed victims are persons proposed for the Support and Protection Programme by NGOs or other actors, based on trafficking indicators. However, unless they are subsequently formally identified and entered into the Programme, their data are not recorded in the THB statistics.
<b>Slovenia</b>	✓	✓		Both groups are part of national reports. From the data provided, it is unclear (to check) if data on both presumed victims and formally identified victims is provided to Eurostat.
<b>Spain</b>	✓ (NGOS only)	✓		In Spain, official statistics on THB are based exclusively on formally identified victims. Generally, NGO collect data, but this is not entered into a national database.
<b>Sweden</b>	✓	✓		In Sweden, official crime statistics produced by the National Council for Crime Prevention (Brå) are currently based exclusively on formally identified victims, as recorded by the police. A formally identified victim is someone who has entered the police case management system, even if legal certainty (e.g. a conviction) has not yet been reached. Presumed victims, such as those identified by the Gender Equality Agency (GEA) or the Migration Agency, are not included in the official statistics, as Brå cannot reliably determine whether these individuals are already registered by the police.

## Forms of exploitation

Generally, Member States **fully align with the 2011 EU Anti-Trafficking Directive by criminalising all forms of exploitation** outlined in Article 2 of this Directive. However, for five Member States, representatives indicated that their Member States' legal definitions only partly align<sup>41</sup> with the legal definition of the Directive. They reported gaps in legal definitions in the national legislation, e.g. the absence of separate references to criminal trafficking in human beings. For example, in Denmark, there is no separate reference to begging, but begging is a criminal offence in Denmark as per the Danish Penal Code § 197.<sup>42</sup> In **Hungary**, slavery, practices similar to slavery, and servitude are still not explicitly included<sup>43</sup> the definition of THB includes slavery and servitude under broader case law. **Poland, Romania and Sweden** lack explicit references to criminal exploitation. In Poland, this currently falls under "other forms of exploitation", while in Sweden, criminal exploitation is recorded under a general category.

Regarding the **additional forms of exploitation added to the amended EU Anti-Trafficking Directive** (exploitation of surrogacy, of forced marriage, or of illegal adoption), statistical data collection was opened in 2024, while full reporting will be mandatory from the year of 2026, as transposition of the amended Directive is still ongoing. Five Member States reported having already fully aligned their legislation (while the transposition of the Directive is still ongoing).<sup>44</sup> It should, however, be noted that these Member States do not necessarily need to explicitly embed the three forms in their anti-trafficking legislation if these forms can be criminalised under the trafficking legislation.

In the **Netherlands**, revised legislation is still pending. Therefore, representatives of 20 Member States indicated that their Member States' legislation currently only **partly aligns**<sup>45</sup> indicating that the three forms of exploitation are not all yet explicitly referenced. In some of these countries' legislation already includes reference to (the exploitation of) forced marriage and or illegal adoption<sup>46</sup>, but for all, the exploitation of surrogacy is not included in the THB legislation. However, some Member States have

<sup>41</sup> Denmark, Hungary, Poland, Romania and Sweden.

<sup>42</sup> <https://www.cmm.dk/om-menneskehandel/lovgivning/dansk-straffelov> See <https://www.cmm.dk/om-menneskehandel/lovgivning/dansk-straffelov>

<sup>43</sup> Hungarian Criminal Code, Law No 100 of 2021, § 192. (2 and (4) <https://net.jogtar.hu/jogszabaly?docid=a1200100.tv>

<sup>44</sup> Estonia, Lithuania, Malta, the Netherlands, and Romania. Estonia's Penal Code already covers the three new exploitative purposes, but only forced marriage is explicitly listed as a trafficking purpose; surrogacy and illegal adoption are covered via separate offences. In Lithuania, the THB allows for the emergence of new forms of human trafficking, as the phrase "or for other exploitation purposes" is added. Exploitation for forced marriage is mentioned in the THB law, while exploitation of forced marriage and illegal adoption are also explicitly mentioned in the Criminal Code. The Netherlands states that it is fully aligned (although legislation is still pending and has not been adopted yet). The bill to modernise and expand the criminalisation of human trafficking was adopted by the House of Representatives on June 10, 2025(6), but not yet by the First Chamber.

<sup>45</sup> Austria, Belgium, Bulgaria, Croatia, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Luxembourg, Poland, Portugal, Slovakia, Spain and Sweden.

<sup>46</sup> For example, in Cyprus, illegal adoption is already embedded in the anti-trafficking legislation.

separately criminalised it. Representatives of five Member States mention that amendments have been made and **that draft legislation is currently pending**.<sup>47</sup>

Whether or not Member States' legislation aligns can be debated. The amended Directive states (recital 6) that "the exploitation of surrogacy, of forced marriage or of illegal adoption can already fall within the scope of offences concerning THB as defined in Directive 2011/36/EU, to the extent that all the criteria constituting those offences are fulfilled".

Another challenge identified is that victims might be trafficked for multiple purposes of exploitation, and similarly, an offender might also be suspected, prosecuted or convicted for multiple forms of human trafficking. This makes it difficult to provide separate statistics on the forms of exploitation. That this is an issue was acknowledged by multiple countries<sup>48</sup>. Another challenge highlighted is that the national data systems might only give a few options to select from.

**Austria** reported that while justice statistics cover prosecutions and convictions, there is no linkage across stages and various forms of exploitation. In **Bulgaria**, the system usually attributes one main exploitation type per victim, due to which cases involving multiple exploitations (e.g. sexual and labour exploitation, or child victims exploited in both begging and criminal activity) are rarely captured in full. **Finland** highlights that Eurostat only gives 4 possibilities: 1) sexual and labour, 2) sexual and other exploitation, 3) labour and other exploitation, 4) other multiple forms of exploitation. In **Hungary**, it can be recorded, but if done in relation to the offender, the system shows multiple perpetrators in the case, instead of one. Some countries (e.g., **Ireland, Slovakia, Sweden**) state that the primary offence rule is normally used, although Romania notes that, due to a lack of information, this might not always be clear. **Luxembourg** highlights that this can only be corrected with a manual analysis.

These challenges, next to the fact that not all stakeholders report this data, prevent countries from fully capturing the complexity of a case, and might lead to the fact that certain forms of exploitation may be underrepresented in official statistics, while these were reported or occurred."

### 3.2.2 Coordination and data collection models

Coordination and data collection models form the basis for national data collection and the production of reliable, meaningful EU THB statistics. EU-wide THB statistics are as robust as the national statistics that inform them. Understanding how national data is collected and produced is therefore crucial to ensure quality, completeness, comparability, and consistency across Member States. Different national models have an impact, for example, on who can identify and register cases, what kind of information gets recorded, and which cases remain invisible. **Data collection** refers to the structural and institutional arrangements used to organise, coordinate, and manage data collection at the Member State level.

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<sup>47</sup> Belgium, Germany, Latvia, the Netherlands, and Sweden.

<sup>48</sup> Austria, Bulgaria, Cyprus.

**Coordination** refers to the main authority, institution, or organisation responsible for collecting and reporting data on THB at the Member State level. This coordinating body combines national data and submits it to Eurostat. Other national actors involved in data collection include authorities and organisations that contribute to the data collection, including those institutions that are entitled to identify victims of trafficking, as well as additional key stakeholders who may provide relevant data but are not currently part of the formal data collection process.

The amended EU Anti-Trafficking Directive compels Member States to establish National Anti-Trafficking Coordinators or equivalent mechanisms. Additionally, they establish independent bodies (Article 19). Article 19(2) sets out the tasks these national anti-trafficking coordinators or equivalent mechanisms should perform, including, where relevant for data collection, “the carrying out of assessments of trends in trafficking in human beings, the measuring of results of anti-trafficking actions, including the gathering of statistics in close cooperation with relevant civil society organisations active in the field, and reporting”. While it provides guidance on the mandate and required resources, **it does not set out minimum standards that these coordinating bodies are expected to meet**. Following Article 19a (1), Member States are further obliged to put in place a system “for the recording, production and provision of anonymised statistical data”. However, **no further guidance is given on the design, structure, or operation of such a system**.

This is important to highlight, as it determines the room for flexibility considering the design and set-up of these bodies and systems that Member States enjoy. Several Member States have developed promising practices in data collection. Case Study 1 revolves around those practices. The full case study can be found in Annex IV and Annex V. Relevant extracts of the case study are presented throughout this section.

### Main actors

**No single actor can report on all facets of the complex phenomenon of THB**; therefore, multi-stakeholder involvement is needed to provide data. This is also underlined by the diversity of stakeholders responding to the survey, as responses were received from 11 different stakeholder types. Findings also show that **the (number of) stakeholders** involved in the collection of THB statistics may be strictly defined, based on membership of Task Forces or interministerial working groups, but may also be loosely structured. In any case, none of the Member States reports having everyone on board who could potentially contribute to THB statistics, as will be detailed below.

Furthermore, when it comes to collecting and reporting data, **coordination** is mainly in the hands of governmental bodies (alone, with the national statistical office, or with an independent (state) institution). In a few cases, another actor is solely responsible (i.e. national statistical office or independent (state) institution). The main coordinators responsible for collecting and reporting data on THB typically fall into six main categories.

- **Governmental body in cooperation with the national statistical office (ten Member States)**<sup>49</sup> - A governmental body is responsible for the coordination of anti-trafficking efforts, including the collection of statistics, which is sent to the national Statistical Office, which is responsible for the further dissemination to, amongst others, Eurostat. In some Member States, it is explicitly mentioned that the national Statistical Office is collecting additional data (Latvia). In other Member States, the national Statistical Office is working solely with the data set retrieved from the government (Slovenia). In Italy, there is no formal authority responsible for coordinating the collection of national data. However, the Department for Equal Opportunities, as the National Anti-Trafficking Coordinator, oversees the effective collection of data. This process is supported by the Italian National Institute of Statistics (ISTAT), which compiles the data.
- **Governmental body (eight Member States)**<sup>50</sup> - A governmental body coordinates the collection of data and communicates the statistics with Eurostat (e.g. Hungary, Poland, Spain, Sweden). The function is mostly within the Ministry of Interior (Hungary, Poland, Romania, Spain), but also the Ministry of Justice (Estonia, Sweden), or interministerial (MIPROF, France).
- **National statistical office (two Member States)** - The national statistical office coordinates the collection of data and communicates the statistics with Eurostat (Finland) or delegates the responsibility for the provision of statistics to Eurostat to specified data providers (Portugal).
- **Governmental body and an independent institution (two Member States)** - Both the governmental body responsible for data collection, as well as the independent institution of the national rapporteur report statistics (Belgium and Ireland).
- **Independent state institution (three Member States)** - The coordination of data collection and reporting to Eurostat is performed by an independent state institution (Denmark, Luxembourg, and the Netherlands).
- **Independent non-governmental institution as national rapporteur (two Member States)** - An independent non-governmental institution is appointed as national rapporteur and made responsible for the collection of data and reporting to Eurostat (Germany and Lithuania).

These categories serve an illustrative purpose, as the legal mandate largely governs who can contribute to the data collection and how the data is collected. This is further elaborated in the sections below.

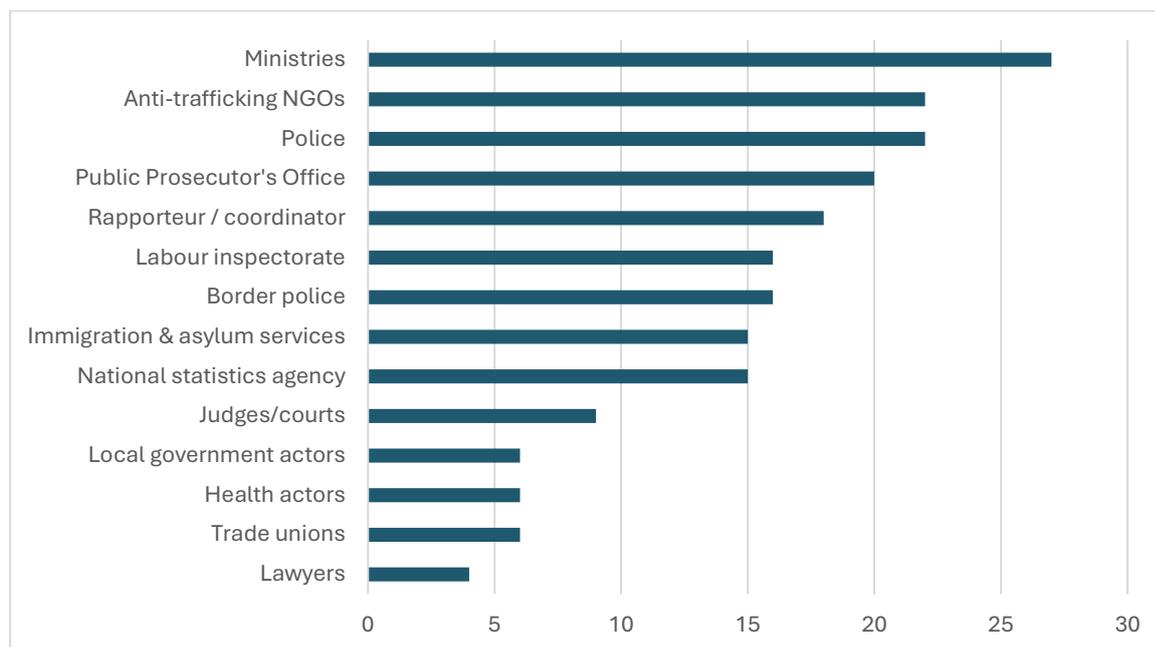
Besides the main coordinators described above, a variety of other actors are also involved in data collection. Some of the actors discussed below serve as the main coordinators in certain Member States, while acting as supporting actors in others. For this reason, institutions commonly identified as coordinators - such as national rapporteurs, ministries, or statistical offices - also appear among the list of other actors involved in data collection.

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<sup>49</sup> Austria, Bulgaria, Croatia, Czechia, Greece, Latvia, Slovenia, Slovakia, Italy, and Malta.

<sup>50</sup> Cyprus, Hungary, Poland, Spain, Sweden, Romania, Estonia, and France.

Figure 5 - Main actors involved in the collection of THB data in the EU



The figure shows the **central role of ministries, police, prosecutors, and NGOs** in the collection of THB data. In all 27 Member States, one or multiple ministries are involved in data collection, either as the coordinator or as an actor providing data. The police (mentioned by 22 Member States<sup>51</sup>) and the border police (mentioned by 16 Member States<sup>52</sup>), as well as the public prosecutor's office (mentioned by 20 Member States<sup>53</sup>), contribute widely to THB data collection. Anti-trafficking NGOs also play a crucial role in data collection (as mentioned by 22 Member States<sup>54</sup>).

**More limited, but still considerable, involvement** can be witnessed by national statistics agencies (15 Member States<sup>55</sup>), labour inspectorates (16 Member States<sup>56</sup>), and immigration and asylum offices (15 Member States<sup>57</sup>). **The least frequently involved actors** mentioned in data collection are

<sup>51</sup> Austria, Bulgaria, Cyprus, Finland, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania.

<sup>52</sup> Belgium, Bulgaria, Croatia, Czechia, Denmark, Finland, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovenia, Sweden.

<sup>53</sup> Belgium, Bulgaria, Croatia, Czechia, Denmark, Finland, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden.

<sup>54</sup> Austria, Belgium, Bulgaria, Cyprus, Czechia, Denmark, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, and Sweden.

<sup>55</sup> Austria, Bulgaria, Czechia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Malta, Slovakia, Slovenia, Sweden.

<sup>56</sup> Belgium, Bulgaria, Croatia, Denmark, France, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Romania, Slovakia.

<sup>57</sup> Belgium, Bulgaria, Denmark, France, Greece, Hungary, Ireland, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Portugal, Romania, and Sweden.

judges/courts (nine Member States<sup>58</sup>), trade unions (six Member States<sup>59</sup>), local government authorities (six Member States<sup>60</sup>), health actors (six Member States<sup>61</sup>), and lawyers (four Member States<sup>62</sup>).

At the same time, **some of these actors are considered to be crucial** for compiling comprehensive national data on THB.<sup>63</sup> Member States mentioned trade unions<sup>64</sup> and health actors<sup>65</sup> explicitly as actors that could make a significant contribution to THB data collection because of their proximity to THB victims, but who, to date, remain largely uninvolved. Interestingly, while the labour inspectorates and immigration and asylum services have been more widely involved in data collection than the trade unions and health care actors (as the above figure shows), they were also identified as actors who could contribute more significantly than they do to date.<sup>66</sup>

**Other actors mentioned as relevant for the national data collection, but not currently part of the process**, included local/regional/federal authorities, child welfare and social services, youth care, financial intelligence units, victim support agencies, migrant rights organisations, and specific human rights institutes. Agencies working with children (such as child welfare services and youth care) are especially important to include, because minors in (institutional) care are visible to these agencies—but not necessarily to others—due to their protected status. Therefore, efforts should particularly be made to include the THB-relevant data of these agencies in the national statistics, as the minors will likely not show up in data provided by other stakeholders.

It is observed that the lack of inclusion or fragmented inclusion of data from relevant actors in the anti-trafficking field may lead to substantial gaps in data collection. This shows that the problem is not merely the hidden or unknown aspects of the THB situation, but the fact that not all available data (known information) is systematically captured in official statistics.

### Main data collection models

Findings indicate that Member States employ various data collection models to gather data for national statistics. This was also confirmed by the survey, where 56% of the respondents indicated having a centralised system in their Member State, 27% having a decentralised system, and 15% did not know. Among respondents with a centralised system in their Member State, 25% stated that they

<sup>58</sup> Belgium (indirectly: Ministry extracts data from National Convictions Databank),, Bulgaria, Latvia, Lithuania, the Netherlands, Portugal, Slovakia, Slovenia, and Sweden.

<sup>59</sup> Bulgaria, Denmark, Hungary, Ireland, Slovenia, and Sweden.

<sup>60</sup> Austria, Bulgaria, Denmark, Hungary, Lithuania, and Romania.

<sup>61</sup> Cyprus, Denmark, Hungary, Ireland, Malta, and Romania.

<sup>62</sup> Czechia, Lithuania, the Netherlands, and Romania.

<sup>63</sup> In the following 15 countries, one or more actors were mentioned that should, but are currently not, contributing to THB data: Austria, Belgium, Bulgaria, Finland, France, Germany, Greece, Ireland, Italy, Lithuania, Luxembourg, the Netherlands, Poland, Slovakia, Spain, and Sweden.

<sup>64</sup> Bulgaria and Sweden.

<sup>65</sup> Bulgaria, Greece, Ireland, and Slovakia.

<sup>66</sup> The labour inspectorate was mentioned by five countries (Austria, Bulgaria, France, Germany, and Italy). The asylum and immigration service was mentioned by nine countries (Austria, Bulgaria, Germany, Ireland, Italy, Lithuania, Luxembourg, Slovakia, and Sweden).

do not have direct access to the system, while 27% stated that they can access it directly.<sup>67</sup> Based on these inputs, the data collection models across Member States can be roughly divided into four categories. Findings stemming from the case studies on particularly relevant practices are interwoven throughout the presentation of the four categories.

**Centralised data collection model with direct entry or access (five Member States).**<sup>68</sup> Data is collected in a single central database to which multiple stakeholders can directly insert their data (i.e. Germany and Portugal, see case study example below). This requires, for all stakeholders involved, stipulated mandates, access, and collaboration agreements on data sharing and data protection. In Lithuania, the data on criminal offences, suspected (accused) persons, and victims generated in the Integrated Criminal Procedure Information System are transferred directly to the Register of Criminal Acts. In Croatia, all stakeholders who are part of the operational anti-trafficking team have access to the centralised data system. Only the insertion of the data is centralised and can only be done by the appointed analysts. The following text box illustrates some practices in more detail.

#### Case study examples: Portugal, Croatia and Germany

**Portugal** collects THB data through two centralised, but separate systems established by law: the National Observatory on THB and the Directorate-General for Justice Policy. The Observatory gathers detailed, quarterly data on victims and exploitation from police and NGOs, using standardised forms and close integration with the NRM to ensure data quality. Justice-related data, such as suspects, prosecutions, and convictions, is collected annually from police, prosecutors, and courts in a highly automated system aligned with Eurostat requirements. Both systems use algorithms and regular stakeholder meetings to prevent double counting. However, because the systems operate independently and cases can span several years, it is difficult to link victim support data with judicial outcomes. To address this, Portugal plans to launch an integrated database in 2026 that will combine victim and justice data, supported by targeted training for data providers. This reform aims to enhance the accuracy, depth, and analytical value of national THB statistics.

In **Croatia**, the Office of the National Coordinator manages a centralised database for trafficking data, based on the National Action Plan. Only this office is authorised to enter and manage data, while key stakeholders—such as police, ministries, the State Attorney’s Office, inspectorate, and NGOs—can access the database to monitor trends but cannot input data themselves. The system is transparent, regularly updated, and supports coordinated action and shared understanding among all involved actors. Official statistics are processed by the Central Bureau of Statistics and forwarded to Eurostat. Further development could include dedicated data analysis software to enhance the system’s analytical capacity.

Since November 2022, the **German** independent National Rapporteur Mechanism on trafficking in human beings at the Institute for Human Rights (DIMR) has coordinated Germany’s trafficking data and official reporting, though its mandate is not yet established by law, which may affect long-term stability. DIMR operates a centralised system that integrates data from federal and regional authorities, law enforcement, and civil society organisations, using secure software and strong privacy safeguards. By combining law enforcement data with information from specialised NGOs

<sup>67</sup> N = 51. NB: 45% of the respondents did not answer this question.

<sup>68</sup> Croatia, Estonia, Germany, Lithuania, and Portugal.

and counselling centres, the system provides a broader, human rights-focused picture of trafficking and victim support. KOK, the German NGO network, contributes anonymised case data via its own tool, focusing on victims' demographics, exploitation types, and access to support. While KOK's data is not fully representative of all trafficked persons, it helps identify gaps in policy and services and supports evidence-based policy development. Regular monitoring reports are produced for parliament and international bodies such as Eurostat and GRETA.

**Centralised data collection model with integrated submission (seven Member States).**<sup>69</sup> Data is collected from multiple stakeholders, who may use standardised or semi-centralised reporting forms. The information is then consolidated into a central database. This method of reporting via reporting forms may result in additional reporting burdens for relevant stakeholders, as they must first register their data in their own systems, and then complete an additional reporting form for the data to be integrated into the central database. This may influence stakeholders' willingness to report, especially when there is no legal requirement for reporting to a central database. At the same time, collecting data from multiple stakeholders and then integrating it into a single central system requires only data analysis at the central level, which can be considered more effective. When analysis is conducted centrally, it may lead to improved data quality, as it enables systematic validation, cleaning, and quality control, helping to identify gaps, errors, or inconsistencies in reported data. However, the quality of national statistics also depends on whether all relevant stakeholders can submit data to the system. In some cases, the range of stakeholders permitted to submit data is limited. In Austria, Bulgaria, and Spain, the range of stakeholders is limited but still includes multiple actors, including NGOs. In Czechia and Denmark, the focus is on data from law enforcement and judicial bodies; data from NGOs that support victims are not included in the national statistics.

**Centralised data collection model based on data extraction (two Member States)**<sup>70</sup>: Data is (automatically) extracted from multiple stakeholders' existing databases—minimising additional reporting burdens—and subsequently processed into national statistics (Finland, Sweden, see case study examples below). In Sweden, a standardised information model is used by agencies such as the police, the prosecutor's office, and courts. Centrally, the data is cleaned, controlled, and integrated into the system, resulting in anonymised microdata, which will be compiled into official national crime statistics and reported to Eurostat. In Sweden, the data is extracted only from criminal justice actors (police, prosecution, courts), with statistics derived from investigations, prosecutions, and judgments. As a result, data from other relevant stakeholders are not captured in national statistics, creating a significant gap in the statistical outputs. The following box text illustrates some practices in more detail.

#### **Case study examples: Finland and Sweden**

In **Finland**, Statistics Finland (STAT) coordinates national THB data collection and reporting, mainly by extracting anonymised data from police and court systems, which reduces manual workload and errors. Personal identifiers are used at the raw-data level to prevent double counting. The National

<sup>69</sup> Austria, Bulgaria, Czechia, Denmark, the Netherlands, Romania, and Spain.

<sup>70</sup> Finland and Sweden.

Assistance System for Victims of Human Trafficking (NAS) plays a key role in identifying victims and monitoring prevalence, covering all formally identified victims, even those outside criminal proceedings. However, NAS data is currently excluded from Eurostat reporting due to overlap with police data, though efforts are underway to re-include it for victims not registered by police. Specialised NGOs also collect data, but about 20% of pre-identified victims who do not enter NAS remain outside official statistics. The main strength of the Finnish system is its automated, centralised approach, but further integration of NAS and NGO data would provide a more complete picture of trafficking prevalence.

In **Sweden**, the National Council for Crime Prevention (Brå) coordinates trafficking data collection, compiles standardised administrative data from police, prosecutors, courts, and customs, and reports official statistics to Eurostat. All agencies use a common information model, enabling seamless electronic data transfer and integration, which minimises double counting and ensures accurate recording of formally identified victims. Brå applies consistent statistical definitions and stores data in a long-term database, supported by a strong legal framework that allows processing of sensitive personal data in compliance with GDPR. While other authorities and civil society organisations collect complementary data on presumed and assisted victims, these are not included in Brå's official statistics due to concerns about overlap and privacy but are used for policy and victim support. Ongoing efforts aim to further improve coordination, standardisation, and the inclusion of NRM data.

**Fragmented data collection with minimal central integration (ten Member States)**<sup>71</sup>: Several actors collect their own data, which is then compiled by a respective ministry or statistical office to report to Eurostat, with minimal integration/analysis in the absence of a centralised system (Belgium, Hungary, Ireland, Italy, Latvia, Luxembourg, Malta, Poland, and Slovenia). Some of these countries have already indicated that new policies/laws are underway towards a more centralised data collection system (Ireland and Poland).

Fragmented data collection with minimal central integration runs the risk of providing incomplete and inconsistent data, as stakeholders are more likely to collect and manage data separately, leading to different definitions and methodologies that affect data comprehensiveness. Furthermore, the absence of central validation and quality control increases the risks of errors.

**Mix of data collection models (three Member States)**<sup>72</sup>

Greece's and Slovakia's data collection can be considered a mix of partly model 1 and mostly model 2. Direct entry is possible, but only by limited stakeholders (mostly law enforcement, judiciary, and or governmental authorities). Other stakeholders (NGOs) have their own data collection system and use reporting forms to submit their data. The following box text illustrates Greece's practice in more detail.

<sup>71</sup> Belgium, Cyprus, Hungary, Ireland, Italy, Latvia, Luxembourg, Malta, Poland, and Slovenia.

<sup>72</sup> Greece, Slovakia, and France.

**Case study example: Greece**

In **Greece**, the Office of the National Rapporteur on Combating Human Trafficking coordinates the collection and reporting of THB statistics, gathering data from public authorities and private actors and submitting it to the Hellenic Statistical Authority and Eurostat. Operational management is handled by EKKA through the NRM/EMA, which collects data on victims using standardised forms from NGOs, while police and the Ministry of Justice provide data on suspects, prosecutions, and convictions. EKKA cross-checks data from different sources to prevent double counting. Data entry is mixed: law enforcement and ministries can enter data directly into the NRM, while NGOs submit forms that are entered by authorised personnel. Although victim and judicial data are held in separate systems, and a fully unified platform is not yet in place, the approach ensures regular, centralised, and anonymised data collection with ongoing efforts to improve integration.

France's data collection model can be considered a mixture of model 2, 3 and 4. The system can extract information directly from the police and gendarmerie's case management systems. Information from NGOs is received through reporting templates. Data is managed through standard office tools and anonymised IT systems of the social ministries, ensuring secure handling but without a dedicated or centralised database.

The diversity of data-collection models used by Member States impacts the reliability, completeness, and comparability of THB statistics across the EU. Centralised systems that allow for direct data entry, data extraction or structured submissions from multiple stakeholders—including law enforcement, judicial authorities, and NGOs providing victim support—are better able to capture the full scope of trafficking, including victims who never enter criminal proceedings. These models also enable centralised validation, quality control, and de-duplication, thereby improving the accuracy and consistency of national statistical data. By contrast, systems based on automated data entry and extraction from criminal justice databases, while efficient and technically robust, are inherently limited to cases recorded by police, prosecutors, and courts. As a result, they might systematically exclude data from other stakeholders, which may lead to underrepresentation of victims in national statistics, if no other data is collected. In the fragmented data collection system, multiple actors collect data separately, and only aggregated figures are forwarded to a central authority, increasing the risk of inconsistent definitions, incomplete coverage, and inability to avoid double-counting.

These structural differences mean that observed variations in THB figures between Member States can be the result of differences in how data is collected and by whom, rather than actual differences in trafficking patterns. This impacts the usefulness of EU-level statistics for comparative analysis, trend monitoring, and evidence-based policymaking, and underscores the importance of moving toward more harmonised, centralised, and multi-stakeholder national data-collection frameworks supported by clear legal mandates.

### 3.2.3 Type of data collected

Article 19(a) of the Directive lays down what data Member States should collect on victims, offenders, and offences related to THB. This section addresses different types of data collected in the following order:

- Victim data;
- Forms of exploitation;
- Offender data (Article 2 offences);
- Offender data (Article 18a 'knowing use' offences);
- Other types of data collected.

It should be noted that most Member States do not collect trafficking data specifically for Eurostat, but instead compile statistics from existing national systems, and often these are designed for criminal justice, victim support, or policy monitoring purposes. Moreover, Member States also receive requests from other national, regional or international bodies to provide statistics (e.g. the US State Department, GRETA or UNODC). The data submitted to Eurostat is typically adapted or harmonised from national sources to meet EU legal requirements under Directive 2011/36/EU and Directive 2024/1712, and also technical requirements for the transmission to Eurostat. In Member States such as Bulgaria, Estonia, and Germany, Eurostat reporting is integrated into broader legal and statistical frameworks. In others, such as Czechia, Italy, and Spain, there is fragmentation or ad hoc data compilation, which limits detail and comparability.

#### Victim data

Article 19(a) of the Directive lays down that Member States should collect data on the number of registered, identified and presumed victims of offences referred to in Article 2, disaggregated by registering organisation, sex, age groups (child/adult), citizenship, and form of exploitation (see following paragraph), in accordance with national law and practices.

In line with this provision, **all Member States report data on victims. Related to victim data, all Member States collect data on sex and age of victims**, although Poland – as the only EU country - does not provide data on sex of the victims to Eurostat, as one data provider (Prosecutors' office) is not providing this information. As for the collection of data on age, some EU Member States only distinguish between data on minors and adults. Some use actual ages, while others use age categories, but these age selection categories vary.

Citizenship is recorded by 16 Member States, while 19 Member States track nationality, although this is formally not requested by the Directive, which only refers to citizenship. In all, 18 Member States explicitly record victims' country of origin, while others rely on nationality or citizenship data. See Table 2 below. Although the concepts of citizenship and nationality are closely related and often used interchangeably, they are not identical. Citizenship is the legal status that recognises an individual as a member of a state, granting them specific rights, protections, and obligations under that state's law.

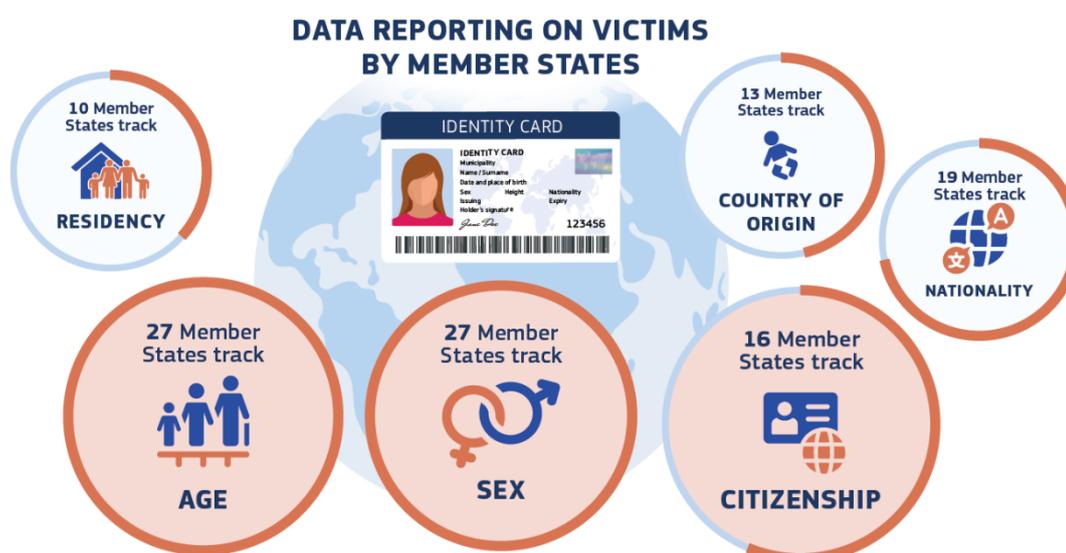
An **undocumented migrant worker usually has a nationality**, because they are legally recognised as belonging to a particular state (for example, by birth or descent). However, they **do not have citizenship in the country in which they reside**, meaning they lack the political and legal rights attached to membership of that state, such as the right to vote or lawful residence. Member States can record their nationality or country of origin but then do not record their citizenship.

Further, a **migrant may originally be of a certain nationality** and later **acquire the citizenship of another country** through naturalisation. In such cases, the person may **retain their original nationality** if the country of origin allows dual nationality or **lose or renounce their original nationality** if dual nationality is not permitted. As a result, a person may hold **one or more citizenships**, while nationality may be recorded differently depending on the legal framework and the administrative practice of the country collecting the data. In statistical and policy contexts, this can create discrepancies where individuals are classified by **nationality of origin** in some systems and by **current citizenship** in others, affecting comparability across datasets.

As there is this difference in, and several members states indicated that it is important to register the nationality of victims and offenders; member states could consider reporting on both citizenship and nationality, but provide at least the data on victims and offenders' citizenship, which is required by the Directive.

Residence data is collected by most Member States, despite not being required by the Directive, with approximately ten tracking legal residency status; however, integration into official statistics is inconsistent. The following figure provides a visual overview of the type of victim data collected across Member States.

Figure 6 - Type of data collected on victims, across Member States



The following table provides a more elaborate overview of the type of data collected on victims. Key observations are included for each category of victim data.

Table 2 - Type of data collected on victims

<b>Data category</b>	<b>Nr. of Member States collecting data</b>	<b>Key observations</b>
<b>Sex</b>	27	All Member States collect data on the sex of the victim (male/female). Only two Member States <sup>73</sup> additionally use gender categories to report on non-binary/trans victims, and in one Member State, transgender victims are grouped under the binary gender category. <sup>74</sup> One Member State, while reporting data on sex of the victims, does not provide data on the sex of the victim when reporting to Eurostat, as one data provider in that Member State does not collect this information. <sup>75</sup>
<b>Age</b>	27	Detailed age data is widely collected and recorded. Some countries report the actual age <sup>76</sup> , while others use age groups. When age categories are used, they vary across Member States and sometimes even within a single Member State. Four Member States <sup>77</sup> only distinguish between minor and adult victims in their data collection system, which is what the Directive requires as the minimum. One Member State collects the data (Spain) but reports to Eurostat only whether the victim is a minor or an adult.
<b>Citizenship</b>	16	Citizenship data is recorded by 16 Member States <sup>78</sup> Six Member States explicitly indicate not to report citizenship <sup>79</sup> ; these Member States likely mainly report nationality. Also, six countries do not make a distinction between citizenship and nationality. <sup>80</sup>

<sup>73</sup> Denmark and Italy. Estonia mentioned that their system only uses the binary system, but that if needed, a difference category can be added manually.

<sup>74</sup> This is the case for the Netherlands.

<sup>75</sup> This refers to Poland, where the data from the Prosecutor's Office that is shared with Eurostat does not include the sex of the victims, as the Public Prosecution Office apparently does not register this to 'prevent discrimination'. Other institutions, such as the police and the National Consulting and Intervention Centre, record this data, but it is not shared with Eurostat.

<sup>76</sup> For example, Cyprus.

<sup>77</sup> Estonia, Ireland, Poland, and Slovakia

<sup>78</sup> Croatia, Czechia, Denmark, Estonia, Germany, Greece, Hungary, Latvia, Lithuania, Malta, Poland, Portugal, Romania, Slovakia, Slovenia, and Sweden.

<sup>79</sup> Austria, Belgium, Cyprus, France, Ireland, Luxembourg, Spain.

<sup>80</sup> Finland, France, Italy, Luxembourg, The Netherlands, and Spain. Finland, Italy and Netherlands (as well as Bulgaria) reported to 'partly' report on citizenship.

Data category	Nr. of Member States collecting data	Key observations
<b>Nationality</b>	19	Nationality is tracked in 18 Member States <sup>81</sup> . Among these countries are Italy and Latvia, who indicated that not all stakeholders clearly distinguish between nationality and citizenship. In addition to these 18 countries, Bulgaria partly collects this; it was stressed here that data on nationality is not systematically collected, separately from citizenship. Only NCCTHB administration and NGOs collect this data separately, but this information is not submitted as official statistical information to Eurostat via the National Statistical Institute. Also, in Hungary, this is done only partially. EKAT only registers the victim's citizenship, but the data collected by 'ENYÜBS' uses nationality instead of citizenship.
<b>Country of Origin</b>	13	Respondents from 14 Member States explicitly mentioned recording victims' country of origin <sup>82</sup> , while others rely on nationality or citizenship data, or it is not consistently used across institutions. <sup>83</sup> Malta is the only Member State that records the country where the (potential) victim was trafficked from, instead of the country of origin. Austria, on the other hand, is the only Member State that registers the country of origin, which is used to derive the nationality and citizenship of the persons.

### Forms of exploitation

**Most Member States collect data on the forms of exploitation for victims.** France indicated only to partly report on **sexual exploitation and forced labour**, while Finland indicated not to report the number of victims by form of exploitation to Eurostat. Further Member States noted that they only partly report on **(forced) begging**.<sup>84</sup>

When it comes to **exploitation for criminal activities**, 26 Member States report this, of which six Member States indicate that this is only partly the case.<sup>85</sup> Sweden is the only EU Member State stating

<sup>81</sup> Belgium, Croatia, Cyprus, Czechia, Denmark, Finland, France, Greece, Italy, Latvia, Lithuania, Luxembourg, Netherlands, Portugal, Romania, Slovakia, Spain and Sweden.

<sup>82</sup> Austria, Croatia, Cyprus, Czechia, Denmark, Germany, Greece, Ireland, Italy, Netherlands, Portugal, Romania, Slovakia and Sweden report nationality. This is partly reported by Belgium, Bulgaria, Estonia, Hungary, Luxembourg, Poland and Spain. Countries that indicated not to collect data on country of origin are Finland, France, Latvia, Lithuania, Malta and Slovenia.

<sup>83</sup> At least in Bulgaria and Hungary.

<sup>84</sup> Finland, Italy, the Netherlands, and Poland. For Finland, it is stated: Disaggregated by the NAS and the NBI, not included as a separate category in PATJA and hence grouped as "other forms" in official statistics/Eurostat reporting. For Italy, this concerns only the data available through the SIRIT Platform. In the Netherlands, forced begging is sometimes categorised as exploitation of criminal activities, as begging is criminalised. For Poland it was indicated that this is partly the case, but no further information was provided.

<sup>85</sup> Austria, Bulgaria, Finland, Italy, Poland, and Romania.

no, indicating that disaggregation by specific forms of exploitation is not always possible because the Swedish criminal justice system does not have a dedicated crime code for every type of exploitation. During the NACR workshop, it was confirmed that this is the case for more Member States. From the desk research, it was indicated that for Finland and Romania, such cases were recorded under 'other'.

Cases involving forms of exploitation that lack a specific code, such as criminal exploitation or the new forms introduced by the amended Directive, are typically registered under 'other'. Consequently, statistics may not fully distinguish all exploitation types, which can limit a detailed analysis of the prevalence of each form.

The exploitation for **organ removal** is reported by 25 Member States, including Latvia and Lithuania, which indicated not to have had any cases yet.

**The exploitation of forced marriage** is reported by 25 Member States, of which ten indicate that they do this only partly, due to exceptions. Ireland and Sweden are the only two Member States that do not collect this data. Many Member States are still in the process of incorporating the exploitation of forced marriage into national legislation. Regarding exploitation of **illegal adoption**, 18 Member States indicate that they report this separately; however, some mention exceptions again, and several indicate that they have not yet collected any such cases. Regarding exploitation of **surrogacy**, 14 Member States (including those that responded 'partly') indicate that they offer this option, in case such cases would appear. Some countries reported no, just because such cases had not yet been reported to the relevant stakeholders in their country, even though also in the 14 Member States who offer the option, such cases are generally absent.

The following figure illustrates the number of Member States that collect information on the various identified forms of exploitation.

Figure 7 - Number of Member States that record data per form of exploitation



### Offender data (Article 2 offences)

Article 19(a) of the Directive lays down that Member States should collect data on:

- the number of **persons suspected** of the offences referred to in Article 2, disaggregated by sex, age groups (child/adult), citizenship, and form of exploitation;
- the number of **persons prosecuted** for offences referred to in Article 2, disaggregated by sex, age groups (child/adult), citizenship, form of exploitation, and nature of the final decision to prosecute;
- the number of **prosecution decisions** (i.e. charges for offences referred to in Article 2, charges for other criminal offences, decisions not to charge, other);
- the number of **persons convicted** for offences referred to in Article 2, disaggregated by sex, age groups (child/adult), and citizenship;
- the number of **court judgments** (i.e. acquittal, convictions, other) for the offences referred to in Article 2.

Member States' practices vary in how they collect and report this data. In all, **26 Member States report on the number of suspected persons, including a full disaggregation** by sex, age groups, citizenship and form of exploitation. The exception is Bulgaria, as it was indicated that they report only on prosecuted and convicted individuals.<sup>86</sup> In Germany, while this data is recorded, there are no chronological statistics that link data on known crimes and suspects with data from judicial statistics on persons who have been tried and convicted. Comparability is particularly limited due to the different times at which the data is collected, as there can sometimes be several years between the case being handed over to the public prosecutor's office, the indictment, and the trial.

While data on the sex, age and citizenship of suspects is widely collected, **their citizenship is sometimes tracked as nationality instead, as was observed with the data collected on victims.**

Also, the **form of exploitation is inconsistently reported**. Only 19 Member States report this, including five Member States recording partial data.<sup>87</sup> Seven Member States do not collect this data at all.<sup>88</sup> This information can only be collected manually from court files. For example, for Finland, it is stated that this information is not regularly collected. Data on forms of THB can be collected manually, if necessary, by reading judgments entered into the AIPA system by the court that issued the judgment. During the NACR workshop, this was also confirmed to be the case for more Member States.

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<sup>86</sup> I.e. all but Bulgaria. In Bulgaria, official data transmitted to Eurostat concern prosecuted and convicted persons, not mere suspects. This is because the main source is the Prosecution Service (БКП), which registers cases once a person is formally charged under the Criminal Code (Arts. 159a–159g). "Suspected persons" recorded at the police/investigation stage are not systematically included in the NCCTHB or Eurostat reporting. This means Bulgaria's statistics reflect only the judicial pipeline (prosecution and conviction), not early-stage law enforcement suspects. Sometimes and for specific data analysis or reporting, data concerning suspects can be provided to the NCCTHB (for example for the TiP reporting/US State Department). NSI also state to receive official information about the suspects from the Ministry of Interior.

<sup>87</sup> Bulgaria, Finland, Greece, Luxembourg, and the Netherlands.

<sup>88</sup> Austria, Finland, Ireland, Italy, Poland, Portugal, and Slovakia.

**In all, 24 Member States report data on the number of prosecuted persons, while Greece and Germany report on this only partly. For France, this was not reported.** Further, 23 Member States record the **number of persons convicted for trafficking offences**<sup>89</sup>. For both prosecuted and convicted persons, Member States tend to record the sex, age and citizenship/nationality,<sup>90</sup> but sometimes this data needs to be extracted manually, and this is not done for every case. The form of exploitation is recorded for prosecuted persons by 17 Member States, while five do not record it<sup>91</sup> and four<sup>92</sup> only partially. For Ireland, this was not indicated.

As for convicted persons, their sex is reported by 21 Member States; one Member State indicated not to record this<sup>93</sup> and three reported to only do this partly.<sup>94</sup> For one Member State, no response was provided.<sup>95</sup> The age of convicted persons is recorded by 20 Member States, while four Member States<sup>96</sup> do not report this, and three only partly.<sup>97</sup>

With citizenship of convicted offenders, the same challenges are noted as reported earlier, and only 16 Member States report this; others do not report this or only partly. Overall, the currently available data suggest that most Member States collect and report data on Article 2 offences, with a primary focus on suspects, prosecutions, and convictions. However, while most Member States collect the basic demographic information and report on suspects, prosecutions and convictions, there are **gaps concerning the form of exploitation and the progression of cases through the justice system**. Detailed data on the outcome of these offences, such as the number of convictions or acquittals, is inconsistent across Member States. **Only 14 Member States<sup>98</sup> break down the prosecution decisions by outcome**. Six Member States do not do so at all<sup>99</sup>, and the others (seven Member States)<sup>100</sup> only partially track this.

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<sup>89</sup> Finland reported not to be able to provide this data. "If a court decision has been made in the case, STAT can obtain the data manually by reviewing court decisions entered into AIPA – information cannot be extracted from prosecution data system) Greece and Luxembourg stated to do this partly and also for Luxembourg this requires a manual exercise to check such data in court files. Poland reported not to collect this data. Ireland, while reporting on this - and included in the 23 countries that report this data - indicated that the data is ad hoc collected.

<sup>90</sup> As previously mentioned, in some countries the citizenship is replaced by/ derived from the nationality.

<sup>91</sup> Austria, Italy, Poland, Portugal and Slovakia.

<sup>92</sup> Finland, Greece, Luxembourg, Netherlands only partly report on forms of exploitation of prosecuted offenders.

<sup>93</sup> Slovakia.

<sup>94</sup> Belgium, Germany and Greece.

<sup>95</sup> Ireland.

<sup>96</sup> Ireland, Luxembourg, Slovakia and Slovenia.

<sup>97</sup> Germany, Greece and Luxembourg.

<sup>98</sup> Croatia, Cyprus, Czechia, Estonia, Germany, Hungary, Latvia, Lithuania, Luxembourg, Malta, Poland, Romania, Spain and Sweden.

<sup>99</sup> Denmark, Finland, France, Ireland, Italy, and Slovenia.

<sup>100</sup> Austria, Belgium, Bulgaria, Greece, the Netherlands, Portugal, and Slovakia.

### Offender data (Article 18a (1) 'knowing use' offences)

Article 19(a) of the Directive lays down that Member States should collect data on the number of persons suspected, persons prosecuted, and persons convicted, for offences referred to in Article 18a(1), disaggregated by sex and age groups (child/adult).<sup>101</sup>

**Member States vary substantially in their reporting of "knowing use" offences.** Data on the number of suspected, prosecuted and convicted perpetrators is hardly recorded, and the same applies to data on their sex, age and citizenship. Provision of such data, however, is now mandatory under the amended Directive. For example, only six Member States report data on the number of suspected persons for this offence.<sup>102</sup> 18 Member States<sup>103</sup> do not record this, while three do so only partly<sup>104</sup>. The reason for not reporting the data is mainly that the Member States have no separate criminal offence for the knowing use of services by trafficked persons yet, and some indicate that there have been no cases prosecuted. Three Member States indicate to report on this partly.<sup>105</sup> In the Member States that do not report this data, or report it only partially, some, such as **Austria** and **Bulgaria**, include the offence within broader trafficking laws, and the data is not disaggregated and transmitted to international databases such as Eurostat. **Croatia** records the data internally but does not report it to Eurostat. While **Slovakia** criminalises it as an offence, here, there is limited data reported or none at all, with few prosecutions.

### Other types of data collected

Some Member States **collect data on human trafficking beyond what is required by the Directive.** This includes recruitment methods, trafficking routes, high-risk sectors, and links to organised crime and or data on offline and online recruitment and exploitation. This has also been observed in the survey, where 49% of the respondents indicated they collect 'other' data.

**Data on offline and online recruitment** and exploitation are recorded by several Member States.<sup>106</sup> However, this does not appear to be structurally recorded and may not be statistical data, but rather more general data collected through research or surveys by monitoring bodies. **Data collected on trafficking routes and modus operandi** are mainly used for internal investigations. **The use of**

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<sup>101</sup> Article 18(a): Member States shall take the necessary measures to ensure that, when it is an intentional act, the use of services provided by a victim of an offence referred to in Article 2 constitutes a criminal offence, where the victim is exploited to render such services and the user of the services knows that the person providing the service is a victim of an offence referred to in Article 2.

<sup>102</sup> Cyprus, Latvia, Lithuania, Romania, Slovenia and Sweden.

<sup>103</sup> Austria, Belgium, Czechia, Denmark, Estonia, France, Germany, Greece, Hungary, Ireland, Italy, Luxembourg, Malta, the Netherlands, Poland, Portugal, Slovakia, and Spain.

<sup>104</sup> Bulgaria, Croatia and Finland.

<sup>105</sup> Bulgaria, Croatia, and Finland.

<sup>106</sup> For online recruitment, these are Bulgaria, Croatia, Czechia, Denmark, Ireland, Latvia, Lithuania, Poland, Portugal, Romania, Slovakia and Sweden, which record this information and others.

**technology as an aggravating circumstance** (Article 4 -3b of the amended Directive<sup>107</sup>) is only recorded by five Member States.<sup>108</sup>

It should be noted that the collection of other types of data often lacks standardised reporting. Information is sometimes collected in police/prosecution case files (e.g. recruitment via acquaintances, family, agencies) but not systematically coded in national statistics. Moreover, offences recorded as part of 'other' might sometimes not show up in THB statistics (for the reasons indicated above).

### 3.2.4 Legal or policy basis for data collection and provision

A legal or policy basis for data collection and provision ensures that, in practice, data is indeed provided and that privacy concerns are duly considered. While the EU Anti-Trafficking Directive obliges Member States to ensure that a system is in place for recording, producing, and providing data, it is **left to Member States to decide how to set up such a system and under what conditions**. This includes the mandate required for data collection and provision.

When assessing the **legal or policy basis of data collection** across the Member States, 20 Member States are found to have a legal basis for the data collection and provision, at least for the main actors.<sup>109</sup> The legal basis is primarily focused on the legal framework for the main actors receiving data, and to a lesser extent, on the parties that provide the data. When **data exchange** arrangements are concluded, this is mostly done with law enforcement agencies and other authorities, but far less frequently with civil society actors, healthcare providers, and social workers. Of the 20 Member States that have a legal basis, six have indicated **additional policies** to be relevant for data collection.<sup>110</sup> Five Member States have a mere policy basis,<sup>111</sup> of which for four the basis is found in the National Action Plan.<sup>112</sup> Malta is the only Member State that has no legal or policy basis for data collection and provision, but relies on goodwill instead.

The **legal basis of national data collection** can be found in different legal provisions/acts, depending on the specific actor in question. **Many Member States have specific anti-trafficking legislation**<sup>113</sup> that mandates data collection. Others rely **on general legal frameworks** such as criminal codes and official statistics acts.<sup>114</sup> GDPR plays a key role in shaping how personal data, especially victim data, is

<sup>107</sup> The fact that the perpetrator facilitated or committed, by means of information and communication technologies, the dissemination of images or videos or similar material of a sexual nature involving the victim.'

<sup>108</sup> Denmark, Ireland, Lithuania, Romania and Sweden.

<sup>109</sup> Austria, Belgium, Bulgaria, Czechia, Cyprus, Estonia, Finland, Germany, Greece, Hungary, Ireland, Lithuania, Luxembourg, the Netherlands, Poland, Portugal, Romania, Slovakia, Spain, Sweden.

<sup>110</sup> Bulgaria, Czechia, Germany, Greece, Ireland, and Lithuania.

<sup>111</sup> Croatia, Denmark, France, Italy, and Latvia.

<sup>112</sup> Croatia, Denmark, Italy, and Latvia.

<sup>113</sup> For example: Bulgaria's CTHBA, Romania's Law 678/2001, Slovakia's multi-law framework.

<sup>114</sup> For example, Czechia, Finland, Sweden, sometimes supplemented by EU regulations such as EU Regulation 223/2009.

handled, with some countries requiring explicit consent (e.g. Hungary) or anonymisation (e.g. Luxembourg).

Eight Member States have indicated the **lack of a legal mandate as a challenge to data collection**.<sup>115</sup> This includes the lack of legal basis/authority to provide or request data from certain actors (Bulgaria, Finland, Greece, Ireland, the Netherlands, and Slovakia), lack of authority to enforce the provision of data from certain actors (the Netherlands and Slovakia), and that some items are not (yet) systematically requested/reported due to lack of legal basis (Estonia).

The absence of a clear legal mandate to provide, receive, or request data **limits national stakeholders' ability to share information with the national data collection authority, largely because of differing interpretations** of privacy regulations. While the data submitted to Eurostat is anonymised, the original source data often contains personal data, which is necessary to prevent double-counting of cases, amongst others. The processing of personal data requires a legal basis (clear public interest or consent of the person concerned), as set out in Articles 6 and 9 of the GDPR. In the absence of a legal mandate specifying a clear public interest based on which the data is processed, data provision can only be done with the consent of the person concerned.

This means that individuals – victims/perpetrators – need to sign a consent form for the sharing of their data, which is often considered a hurdle. As a result, cases may go unreported if there is no consent form available. In addition, the scope of data shared by national stakeholders with the national data collection authority may be affected by Article 5 of the GDPR. This sets out the principles of **data minimisation** — requiring that only data strictly necessary be collected — and **purpose limitation**— requiring that the purposes of data collection be clearly defined. Therefore, establishing a legal mandate that explicitly sets out the public interest, and the objectives of the data collection would, in general, allow stakeholders to operate within the confines of the privacy regulations.

### 3.2.5 Software and tools

Article 19a(1) of the amended EU Anti-Trafficking Directive requires Member States to have a system in place for recording, producing, and providing anonymised statistical data to monitor the effectiveness of their responses to trafficking. While the Directive does not prescribe the type of software or technical setup that should be used, this obligation implies that **Member States must operate data systems that are reliable, secure, and capable of producing consistent statistics**. In practice, this places responsibility on national authorities to choose tools that can systematically capture key indicators, avoid duplication, allow regular updates, and support the generation of comparable data for EU-level reporting.

When examining the tools used by Member States to fulfil their obligations under the Directive, it can be observed that some Member States utilise software tools specifically developed for the purpose, while others use tools available online, such as Microsoft Excel and SPSS. Some Member States also choose to use a mix of tools, while others lack specialised tools and still rely on manual processing.

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<sup>115</sup> Bulgaria, Estonia, Finland, Germany, Greece, Ireland, the Netherlands, and Slovakia.

The following paragraphs present the software that Member States use to collect and store data on the national situation regarding THB. It also elaborates on the measures that Member States take to ensure accurate reporting and prevent double-counting of victims.

Generally, **most Member States use dedicated software tools to support data validation**, analysis, and reporting on THB. Finland uses Power BI, France employs R, SAS, and Cassiopée, and Germany uses LinkAhead for centralised data management with secure online submissions. Italy's SIRIT system is a robust digital platform for tracking victim services. The Netherlands, Portugal, Romania and Sweden use **publicly available** SPSS. Portugal also uses Excel and a public-facing justice statistics platform. Romania also uses SOL, while Sweden uses a mix of software tools, which, in addition to SPSS, also includes Excel, SAS, and R.

Slovenia has an electronic register system used by the Prosecutor's Office; however, some **data is collected manually**, as not all the data necessary for reporting THB situations can be obtained from the register. In Greece, there are no specialised analytical tools; instead, there is only a central system for recording and storing data.

### Double-counting

The issue of double-counting in the collection of THB statistics in the EU refers to the risk that the same victim, incident, or case is recorded more than once in official data. This problem makes it difficult to produce accurate, comparable, and reliable figures across Member States. Double-counting occurs due to the way data is collected, shared, and categorised at national and EU levels. To ensure accurate reporting and prevent inflation of victim numbers, many Member States - at least 18 Member States<sup>116</sup> - have implemented specific measures to avoid double-counting in THB data. These measures range from technical solutions, such as unique identifiers and database validation, to institutional practices such as centralised reporting and manual cross-checks. Findings stemming from the case studies highlight particularly relevant practices, and these have been interwoven throughout the analysis below.

- **Use of unique personal identifiers**<sup>117</sup> allows authorities to track individuals across systems and avoid double-counting. Sometimes, this refers to the personal details of victims, such as their date and place of birth, and other times it refers to an identification number that the persons receive once registered.

#### Case study examples: Bulgaria, Greece and Italy

In **Bulgaria**, the national anti-trafficking agency (NCCTHB) manages a centralised database, receiving aggregate, anonymised data from a limited set of state institutions such as the Prosecution Service and Ministry of Interior. Each institution assigns anonymised unique identifiers to victims and offenders, ensuring each case has a single procedural record. The NCCTHB cross-

<sup>116</sup> Austria, Croatia, Denmark, Estonia, Finland, France, Greece, Italy, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Spain, and Sweden.

<sup>117</sup> E.g. Denmark, Greece, Italy, Luxembourg, Romania, Slovakia, and Sweden.

checks demographic and case information to remove duplicates, and only the Secretariat consolidates the data for annual reporting. Double counting is mainly avoided by relying on prosecution-based statistics and centralising reporting, with victims counted once when formally recognised in criminal proceedings. There is no direct external access to the database and no specialised analytical software.

In **Greece**, the NRM/EMA avoids double-counting of individuals through systematic data verification and the assignment of unique anonymised codes to each victim. Organisations (data providers) use predefined identification fields, such as date of birth, gender and country of origin, to ensure that the same individual is not recorded more than once. After receiving the data reports from the data providers, NRM experts will cross-check the cases, whether there is not too much common information with another case before they confirm with the data providers that it is not the same case.

In **Italy** a general level, double-counting of victims is avoided by using, for statistical purposes and to be shared with Eurostat, only the data from the SIRIT system — not the data on victims identified in criminal proceedings and collected by the Ministry of the Interior — as the SIRIT data are more comprehensive. More specifically, in the SIRIT system, each assisted person is assigned a unique code, and any transfers between projects are tracked within the same system. This ensures that individuals are not counted more than once, even if they receive support in different regions or at different times.

- Data cleaning and manual validation<sup>118</sup> includes de-duplication before analysis and cross-checking court or case records to identify duplicates.
- Centralised reporting from a single trusted source<sup>119</sup> which helps to avoid overlap by selecting only one dataset for official reporting.
- Separation of datasets<sup>120</sup> is used when linking is not possible, with clear disclaimers that totals across systems should not be summed due to duplication risks.
- Algorithmic checks and collaboration<sup>121</sup> involve using software tools or stakeholder meetings to flag potential duplicates based on demographic or case-level similarities.

#### Case study examples: Portugal and Spain

In **Portugal**, there are two main data collectors and data providers: the national Observatory on THB and the Directorate-General for Justice Policy. Both rely on database algorithms to identify potential double counting. These algorithms use variables such as the date of events, types of crime, victims' nationalities, forms of exploitation, and cities of exploitation to cluster similar cases for further analysis and evaluation of possible duplications. In addition, the Observatory conducts meetings with all stakeholders to verify and cross-check potential duplicates. The Directorate-General for Justice Policy also holds meetings for this purpose, although these are limited to police forces.

<sup>118</sup> E.g. Estonia, France, Malta.

<sup>119</sup> At least in Austria, Italy, and Poland.

<sup>120</sup> e.g. in Austria and Sweden.

<sup>121</sup> At least in Lithuania, the Netherlands, Portugal, and Spain.

In **Spain**, the BD-Trata system, managed by the National Rapporteur on Trafficking in Human Beings, incorporates multiple validation filters designed to prevent the double counting of victims.

- Contact update and data analysis.<sup>122</sup>
- Exclusion of data if there are suspicions of double-counting.<sup>123</sup>

Across the reporting, many representatives of Member States explicitly acknowledge that **avoiding double-counting remains a significant challenge**. Even when procedures are in place, the involvement of multiple authorities, fragmented data systems, and differing identification pathways makes it difficult to ensure that each victim is counted only once.

Some Member States also highlighted practical **challenges in avoiding double-counting, which, in turn, can affect the completeness of the data** they report and thus obstruct the full image of the trafficking situation. For instance, Sweden noted that the absence of a unique personal identifier across its institutions makes it impossible to verify which registered cases overall between different institutions and, as a result, they no longer report data from certain actors.

Spain highlighted the issue of the single-counting methodology of Eurostat, which requires that individuals who experience multiple forms of exploitation should be counted only once. This can obscure the complexity of the trafficking situations, as it is not uncommon for victims to be subjected to multiple forms of exploitation.

Another example is Slovakia, which explained that in order to reduce the risk of duplication, it excludes potential victims, leading to under-representation, particularly concerning children, labour exploitation, and Roma communities.

### 3.2.6 Reflections on the impact of the findings on data collection

The reflections on the impact of the findings are based on views collected throughout different data collection methods and build on the researchers' expertise. Five impacts are identified and worth highlighting:

- Divergent definitions, understandings, and approaches among Member States and among stakeholders of the phenomenon hinder the ability to establish coherent statistics on size, trends, **and developments**. Inconsistent inclusion or exclusion of cases and sources of information leads to difficulties in comparing data and drawing accurate conclusions. Diverging approaches might also lead to under- or overreporting and estimation. Consequently, variations in reported numbers may be the result of differences in legal definitions rather than actual trends. These variations may also limit the EU's ability to monitor the scale of trafficking, compare data effectively, and evaluate the impact of national measures.

<sup>122</sup> Croatia.

<sup>123</sup> Finland and Sweden.

- Missing or aggregated data on exploitation types and victim profiles **limits the ability to understand patterns, design targeted interventions, or ensure that all victims**, especially those in less visible forms of exploitation, **are recognised and protected**;
- Gaps in data collection on suspects, prosecuted persons, and convicted persons hinder the assessment of how effectively cases move through the justice system and whether trafficking cases are being downgraded to lesser or other types of offences due to high evidentiary thresholds. Inadequate data also undermines efforts to understand offender behaviour, better target high-risk sectors, or emerging exploitative practices.
- The **absence of a clear legal mandate to collect, request, and enforce the provision of data may result in reluctance to share data** — or in the non-provision of data altogether — particularly where privacy concerns arise due to the processing of victims' personal data and the lack of a solid legal basis.
- **Variations in software capacity can affect reporting accuracy, the level of detail captured, and the ability to detect trends**. Therefore, understanding these differences is essential for evaluating the robustness of national data systems and identifying structural barriers that affect the harmonisation of trafficking data across the EU.

### 3.3 Challenges, needs and recommendations

This section first presents the identified challenges and corresponding needs and concludes by presenting the identified recommendations to national stakeholders and Eurostat.

#### 3.3.1 Identified challenges and needs

Throughout the desk research, interviews, survey and focus groups, challenges and needs<sup>124</sup> related to different elements of the data collection, ranging from the diversity of actors involved to various data collection models have been identified. These challenges are implicitly referred to throughout the previous sections and are presented in more detail in this section. To aid the analysis of these challenges and facilitate their linkage to stakeholder needs and corresponding recommendations, this section categorises the challenges and indicates their prevalence in Member States.

In broad terms, **the challenges can be divided into four categories: legislative, governance, methodological and technical challenges**. These categories are largely deductively derived from the evidence gathered throughout the study. To complement the deductive approach, the categorisation draws from the European Statistics Code of Practice,<sup>125</sup> the Report on Data Collection on Trafficking in Human Beings in the EU,<sup>126</sup> and the UNODC Global Report on Trafficking in Persons 2024.<sup>127</sup>

<sup>124</sup> These can be understood as lessons learned but are referred to as needs for the sake of clarity.

<sup>125</sup> See: <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/edn-20250924-1>

<sup>126</sup> See: <https://op.europa.eu/en/publication-detail/-/publication/5b93c49f-12a0-11eb-9a54-01aa75ed71a1>

<sup>127</sup> See: [https://www.unodc.org/documents/data-and-analysis/glotip/2024/GLOTIP2024\\_BOOK.pdf](https://www.unodc.org/documents/data-and-analysis/glotip/2024/GLOTIP2024_BOOK.pdf)

The first category is **legislative** challenges, whereby efforts to collect, record, and analyse data on THB can be hampered by legislation at different levels (local, regional, national, and EU). Moreover, uncertainties or grey areas in the legal basis of data collection in THB affect the interpretation of THB cases in practice. National judiciaries may classify THB cases as other offences, which can leave a distorted picture of the full statistics. This is illustrated, for example, by the lack of a clear legal mandate to request certain data,<sup>128</sup> and in some cases, on the actual data collection and enforcement of data provision.<sup>129</sup> Similarly, GDPR provisions on privacy and data protection impose restrictions on the sharing of personal data, for example, on victims and offenders.<sup>130</sup> A solid legal basis is therefore needed for both collecting and sharing data, particularly as data access is becoming more challenging due to increasingly detailed and comprehensive Data Protection Impact Assessments (DPIAs). Furthermore, data-exchange agreements are established between the coordinating bodies and the stakeholders responsible for providing data, ensuring GDPR-compliant data collection and sharing.

The second category concerns governance challenges, as the collection and coordination of THB statistics are organised differently across Member States. The inclusion of data collected by various stakeholders, including national statistics agencies, law enforcement, NGOs, and ministries, varies significantly across Member States. The accuracy of data is therefore affected by the inclusive and correct entry of data by all relevant stakeholders. The coordination, roles and responsibilities of different actors involved contribute to fragmentation in the collection and recording of data. This can, in turn, leave gaps in the inclusion of all relevant data from all relevant stakeholders in the THB statistics. Specific challenges identified in the research concern, for example, unclear and overlapping roles/responsibilities in data collection, whereby it is unclear nationally and across borders who collects or governs the data.<sup>131</sup> Moreover, this underpins the collection of data only locally, which is not always aggregated centrally.<sup>132</sup> In addition, as many actors and stakeholders collect data, officially and unofficially, some relevant actors are not providing, or are not asked to provide, data to Eurostat's national data collection.<sup>133</sup> These actors are, for example, migration/asylum authorities,<sup>134</sup> certain (victim-support) NGOs,<sup>135</sup> and the labour inspectorate or labour-related authorities.<sup>136</sup> The reasons some relevant actors do not provide data vary from GDPR concerns to a lack of understanding of the relevance of their data to THB statistics, and a lack of human and material resources to organise its provision.

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<sup>128</sup> Bulgaria, Estonia, Finland, Germany, Greece, Ireland, the Netherlands, and Slovakia.

<sup>129</sup> The Netherlands and Slovakia.

<sup>130</sup> Belgium, Germany, Luxembourg, Malta, the Netherlands, Slovakia, and Spain. Also raised in the interview with Europol.

<sup>131</sup> Bulgaria, Finland, Hungary, Ireland, Italy, Luxembourg, Malta, the Netherlands, Poland, and Slovakia.

<sup>132</sup> Austria, Bulgaria (some actors), Hungary (partly true, two separate data systems), Latvia, Luxembourg, and Slovakia.

<sup>133</sup> Austria, Belgium, Bulgaria, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Lithuania, Luxembourg, the Netherlands, Poland, Slovakia, Spain, and Sweden.

<sup>134</sup> Austria, Bulgaria, Germany, Ireland, Italy, Lithuania, Luxembourg, Slovakia, and Sweden.

<sup>135</sup> Belgium, Bulgaria, Finland, Germany, Ireland, the Netherlands, Poland, Spain, and Sweden.

<sup>136</sup> Austria, Bulgaria, France, Germany, and Italy.

With the extension of additional forms of exploitation (purpose) in the definition of the Directive, it is also likely that bodies working on issues of forced marriage, adoption or surrogacy might have data that is relevant for anti-trafficking action. Overall, it is unlikely that any one actor can capture the full picture without collaborating with other actors. Continuous cooperation, enabled by governance structures, is necessary among all relevant stakeholders to ensure comprehensive and reliable THB statistics.

The third category focuses on **methodological** challenges, which encompass the divergent approaches among stakeholders at different levels (local and national) to data collection. This relates mainly to how the data to be collected is understood, defined, measured and/or estimated. Stakeholders might understand definitions and categories of data differently and thereby collect different types of data. Similarly, some information, such as data on perpetrators, convictions and offences, can be found in court files, but is not always collected, reported or included in the THB statistics. The methodological challenges are further illustrated, for example, by inaccurate data<sup>137</sup> and the incomparability of data from different sources.<sup>138</sup> This relates directly to the challenges posed by the use of different categories, for example, in the breakdown of age.<sup>139</sup> Stakeholders also use different definitions, which are sometimes unclear or poorly explained to all actors involved in the collection of THB data.<sup>140</sup> Different approaches are also used to record exploitation types among data providers.<sup>141</sup> In addition to personnel who compile and develop datasets on THB, operational personnel on the ground play an essential role in identifying and robustly recording data on victims. Taking this together with the methodological challenges, the development and use of a common terminology, harmonised definitions, standardised procedures, protocols and reporting formats is important in realistic statistics on THB. However, overly restricted approaches can lead to systematic underestimation of THB.

The fourth category concerns **technical** challenges inherent in the collection and recording of data. Producing high-quality statistics requires an adequate IT infrastructure and/or at least basic systems to record and analyse data on THB. This is further supported by the use of specific data formats that allow for automation and standardisation of the data.<sup>142</sup> In this study, one of the main technical issues is the recording and storage of data, as a central database is either absent or the current system is insufficient.<sup>143</sup> This renders the recording of multiple forms of exploitation for a single person or a case challenging.<sup>144</sup> Similarly, some actors indicated they do not have access to the requested data, due to

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<sup>137</sup> Bulgaria, Finland, Germany, Hungary, Latvia, Lithuania, Luxembourg, the Netherlands, and Slovakia. Also raised in the interview with Europol.

<sup>138</sup> Austria, Belgium, Bulgaria, Czechia, Finland, France, Germany, Hungary, Luxembourg, Portugal, and Slovakia. 50% of the survey respondents also indicated this as a relevant challenge.

<sup>139</sup> Austria, Belgium, Czechia, Finland, Italy, Latvia, Lithuania, Luxembourg, and Slovakia.

<sup>140</sup> Belgium, Bulgaria, Luxembourg, Malta, the Netherlands, Poland, Slovakia, and Slovenia. Also raised in the interview with Europol.

<sup>141</sup> Belgium, Bulgaria, Finland, Germany, Italy, Luxembourg, Malta, Slovakia, and Slovenia.

<sup>142</sup> See: <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/edn-20250924-1>

<sup>143</sup> Belgium, Bulgaria, Czechia, Hungary, Luxembourg, Malta, Poland, Slovakia, and Slovenia

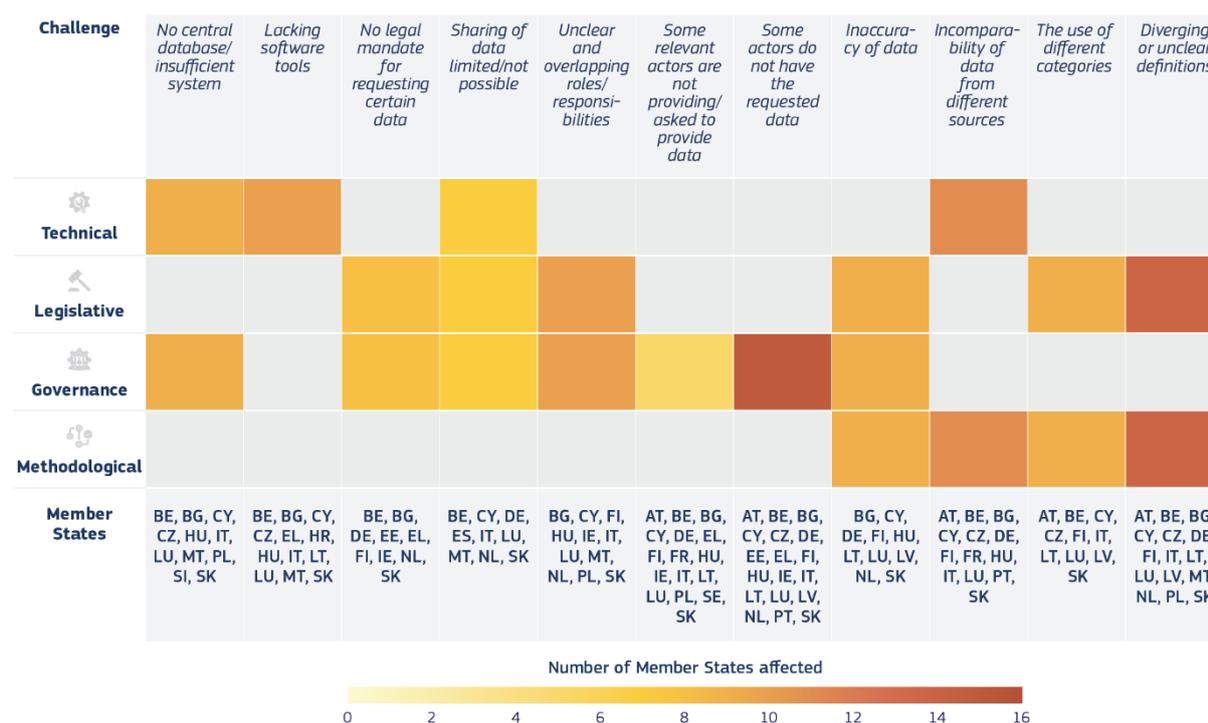
<sup>144</sup> Austria, Bulgaria, Finland, Germany, Hungary, Ireland, Luxembourg, Poland, Portugal, Romania, Slovakia, and Sweden. 50% of the survey respondents also indicated this as a relevant challenge.

technical issues such as datasets that are anonymised or unlinked (rendering it impossible to combine variables across systems).<sup>145</sup>

Also, outdated IT systems that prevent data from being swiftly extracted and/or analysed and the lack of technical and statistical capacity were mentioned repeatedly. Based on these challenges, a centrally coordinated system, where data is collected, consolidated, and managed by either a single authority or a small group of authorities, can be seen as fundamental to producing reliable and official statistics. Lastly, the analysis of data and the lack of appropriate software and/or tools pose another concrete challenge for many Member States.<sup>146</sup> The development of software and/or tools is necessary to facilitate the collection and management of data, especially in Member States, where data volumes are vast due to population size or location near EU external borders.<sup>147</sup>

The figure below presents an **overview of the identified challenges, their categorisation and the prevalence in Member States based on the research**.<sup>148</sup> Due to the complex and cross-cutting nature of the challenges, some challenges overlap in different categories, as depicted in the figure. This visualisation provides a clear idea of pressing needs per category and has been taken into consideration in the formulation of recommendations.

Figure 8 - The prevalence of challenges in Member States



<sup>145</sup> Austria, Belgium, Bulgaria, Czechia, Finland, Germany, Greece, Hungary, Ireland, Latvia, Lithuania, Luxembourg, the Netherlands, Portugal, and Slovakia. Also reported by 50% of the survey respondents.

<sup>146</sup> Belgium, Bulgaria, Croatia, Czechia, Greece, Hungary, Lithuania, Luxembourg, Malta, and Slovakia.

<sup>147</sup> Interview with Frontex.

<sup>148</sup> For the sake of clarity and formulation of recommendations, the challenges have been formulated in broad terms. Specific challenges and their prevalence in Member States have been elaborated on in section 3.2.

### 3.3.2 Identified recommendations

The research demonstrates that current practices for collecting THB statistics are quite advanced and supported by the **amended EU Anti-trafficking Directive**. Many Member States have established national procedures for the collection, recording and analysis of data on THB. However, due to the complexity and evolving nature of the phenomenon, there is room to further improve current practices and approaches to THB statistics.

Based on the categorisation of challenges and needs, as well as the assessment of their prevalence in Member States, a few key recommendations can be identified across the categories at the national level. **The suggested recommendations aim to further improve the quality, consistency, and comparability of human trafficking data in the EU Member States**, ultimately enhancing the effectiveness of national and EU-level responses to trafficking. By focusing on system standardisation and improving data accuracy, Member States can ensure that trafficking data is robust, reliable, and actionable for national policymakers and law enforcement agencies.

The prioritisation of the recommendations varies per Member State due to the different levels and models of data collection. In light of the research and the prevalence of challenges in Member States, the possible prioritisation of the corresponding recommendations has been indicated through the following colour coding:

<b>Prioritisation</b>	 <b>Priority</b>	 <b>Important</b>	 <b>Good practice</b>
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#### Legislative

The amended **EU Anti-Trafficking Directive** largely sets the framework for the collection and sharing of THB data, and puts in place the corresponding national instruments to implement the Directive. Tackling existing legislative challenges at the national level is crucial and remains a priority to ensure the appropriate legal mandate for the stakeholders involved. This includes, for example:

<b>Improving data reporting on victims and suspects/offenders related to "knowing use" offences</b> (Article 18a(1) Anti-Trafficking Directive), now being mandatory, <sup>149</sup> is of key importance.	 <b>Priority</b>
<b>Improve specific reporting on criminal justice-related data as a matter of priority</b> (number and characteristics (sex, age, form of exploitation, citizenship of victims and individuals suspected, number of individuals prosecuted and/or convicted per citizenship, per Member State).	 <b>Priority</b>
<b>Consider clarifying the legal mandate at the national level for the collection and request of data</b> , as well as the conditions for sharing data. This includes, for	 <b>Important</b>

<sup>149</sup> It is acknowledged that Member States have until 15 July 2026 to implement Directive (EU) 2024/1712 and the current data gap is expected at this stage.

example, the purposes for which the data will be processed, and the respective roles and obligations of competent authorities and other stakeholders.	
<b>Provide guidelines on how to share and exchange THB data whilst respecting privacy and data protection legislation both within and between Member States.</b> This consists of, for example, outlining clear conditions for data sharing, with specific safeguards in place for sensitive data or the use of privacy-preserving unique identifiers.	 Important
<b>Improve the inclusion of other forms of exploitation , which is now mandatory.</b> This includes exploitation of surrogacy, of forced marriage and/or of illegal adoption. These forms of exploitation have been added to the definition after the amended Directive.	 Important

### Governance

Addressing challenges related to governance can clarify the roles and responsibilities of different actors involved in THB data. This entails:

<b>Set up coordination models and improve coordination among stakeholders.</b> The establishment of clear agreements delineating the role of each actor, their responsibilities and expectations of the coordinator of the data collection can enhance national collaboration. Coordination models support the national collaboration by allowing the aggregation of data centrally if data collection occurs at the local or regional level.	 Priority
<b>Map and assess the relevance of other national actors in the THB data collection.</b> As multiple stakeholders collect data (directly or indirectly), it is beneficial to identify the relevant actors currently outside of the formal data collection practices. National authorities responsible for the coordination and compilation of THB data can consider including these other actors in the data reporting process, either through informal or formal working arrangements. The identification of relevant other data collectors and their inclusion in the official statistics can support developing a more complete picture of THB in the Member State.	 Important
<b>Systematically report challenges encountered in data collection to the European Commission.</b> Raising issues on, e.g. underreporting, identification difficulties, and inconsistencies in definitions or methodologies to the European level supports future initiatives in addressing common national challenges EU-wide.	 Good practice

### Methodological

Together with legislation, common methodological approaches on understanding and applying definitions, terminology and protocols can increase the availability and quality of THB statistics. This could include:

<p><b>Promote compliance with the EU Anti-Trafficking Directive in the collection of victim and offender data.</b> According to the Directive, this data should be disaggregated by sex, age, citizenship, and form(s) of exploitation. Relatedly, delineating common ranges, for example, age, could improve the comparability of data.</p>	 <b>Priority</b>
<p><b>Include presumed victims in the THB data transmitted to Eurostat, as a matter of priority.</b></p>	 Priority
<p><b>Update national guidelines on definitions regularly by aligning with the EU and other Member States, to promote</b> comparability across Member States. This could include, for example, refining the definition, indicators and categories for collecting data on (new) forms of exploitation in the course of transposing the amended Directive.</p>	 Important
<p><b>Capitalise on the insights that good data on THB</b> would provide and use it to monitor the effectiveness of (national) anti-trafficking efforts and to shape future measures.</p>	 Good practice
<p><b>Provide training and raise awareness of the technical requirements,</b> different national data types and modes of accurate collection and recording of data for authorities and personnel at the operational level. This could contribute to enhancing the accuracy of data, starting from the first entry to the system.</p>	 Good practice

### Technical

Addressing technical challenges and needs requires concrete solutions to improve the databases, software, and tools used to collect, record, and analyse THB data. For national stakeholders:

<p><b>Standardise data cleaning procedures and implement quality checks.</b> This could be carried out through automated de-duplication or manual cross-checking to avoid double-counting. Regular data audits by dedicated personnel can also be considered for controlling the quality of the data if resources allow.</p>	 <b>Priority</b>
<p><b>Develop centralised data systems at the national level</b> with a possibility for integrating data, where possible, directly from relevant public institutions. In Member States where centralised data systems already exist, it could be considered to include possibilities for NGOs and other non-governmental actors to directly enter data into the system.</p>	 Important

<p><b>Issue clear guidelines on recording multiple forms of exploitation for a single victim to avoid double-counting.</b></p>	 Good practice
<p><b>Improve the user-friendliness of national processes for submitting data to Eurostat.</b> This could include <b>clarifying the different fields in the</b> data-submission forms and ensuring that submitted national data can be easily extracted in Excel or other interoperable formats.</p>	 Good practice

At the European level, the **European Commission** plays a central role in coordinating EU-wide approaches to combating THB, including the collection of THB statistics. As Member States are now mandated to ensure data collection at the national level, and this collection is carried out through national approaches and practices, it is crucial that the European Commission/Eurostat continues to facilitate the exchange of good practices among Member States in collecting trafficking data. This could take the form of experience-sharing workshops or targeted thematic meetings. Existing fora, such as the Eurostat working party or the NACR meetings if appropriate.

## 4 Conclusions and way forward

While the present study recognises the work that has already been carried out to ensure that data on THB is being collected across the EU, it also confirms that the production of high-quality, harmonised statistics on THB across the EU depends on a set of core conditions. While Member States employ different models for coordination and data collection, the **effectiveness of these systems depends on the presence of a clear legal basis, consistent definitions, and enforceable data-sharing arrangements**.

In this regard, **comparability is essential**. Even limited divergence in definitions or data categories — such as those for victims or forms of exploitation — can distort both the national level and the EU-wide statistical picture. Furthermore, the study finds that **there is no single optimal model for organising THB data collection**. Both centralised and decentralised approaches can be suited, provided they are underpinned by clear mandates, robust coordination mechanisms, and comprehensive stakeholder inclusion. In the absence of legal clarity or formalised cooperation, data gaps and fragmentation are likely to persist.

**Persistent challenges**—such as double-counting, underreporting of the number of victims and inconsistent reporting timelines—**are often linked to the lack of standardised procedures and technical infrastructure at national level**. However, several Member States have demonstrated that targeted measures (e.g. use of unique identifiers and integrated databases) can improve data quality and completeness. Therefore, the following actions can support Member States in addressing challenges related to THB data collection:

- **Strengthen legal and policy frameworks at the national level:** it would be beneficial if Member States ensured that national legislation clearly mandated the collection and sharing of THB data. This includes establishing formal data-sharing agreements among all relevant actors, including non-governmental organisations, in line with data protection requirements.
- **Enhance coordination mechanisms:** Member States could assess and, where necessary, adapt their coordination models to ensure comprehensive data aggregation. Designating a national focal point for THB statistics can improve accountability and streamline reporting.
- **Invest in infrastructure and capacity:** It would be beneficial if Member States developed or upgraded data systems capable of integrating inputs from multiple sources. This includes implementing tools to prevent duplication and providing training to relevant personnel. EU-level support may be considered for Member States facing technical or resource constraints.
- **Reinforce common standards:** if needed, the European Commission/Eurostat could provide further guidance on definitions, categories, and reporting protocols. Technical exchanges and peer learning can support consistent interpretation and application across Member States.

These steps aim to operationalise the findings of this study and strengthen the EU's capacity to produce reliable, comparable, and policy-relevant THB statistics.

# Annex I - Bibliography

## Documentation relevant to horizontal analysis

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## Annex II - Summary of the validation workshop

The validation workshop with NACR and representatives of national statistics agencies took place in an online format on 13 January. During the 2-hour long online meeting, the draft findings of the study were presented, and participants had the opportunity to indicate to what extent the presented findings resonated. Findings were presented along the pillars presented in chapter 3, namely: definitions, coordination and data collection models, type of data collected, legal or policy basis for data collection and the use of software and tools. These views were captured using the online polling tool MentiMeter. Moreover, feedback was shared orally and in the chat function of the meeting. Feedback received was taken into consideration by the research team when drafting the final report.

The following visuals reflect the results of the MentiMeter polls geared towards gauging to what extent the draft findings resonate with the audience.

Figure 9 - MentiMeter result 1

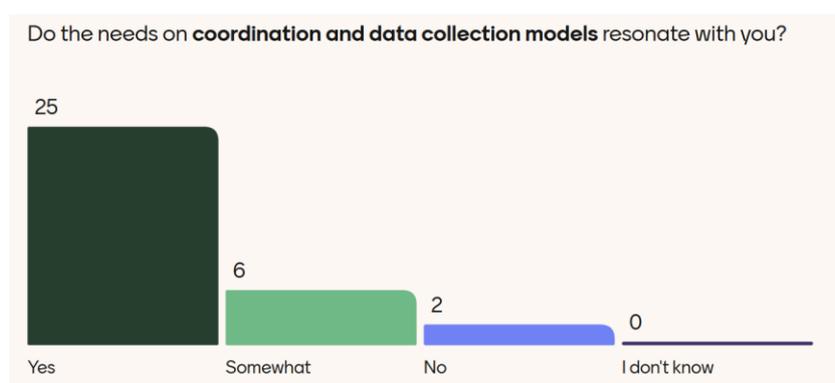


Figure 10 - MentiMeter result 2

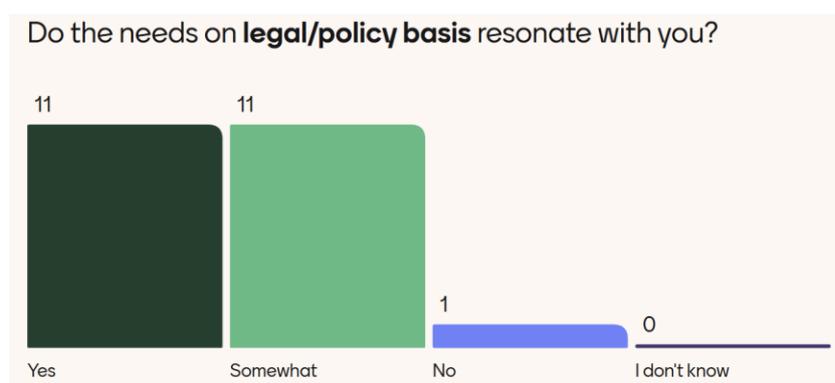


Figure 11 - MentiMeter result 3

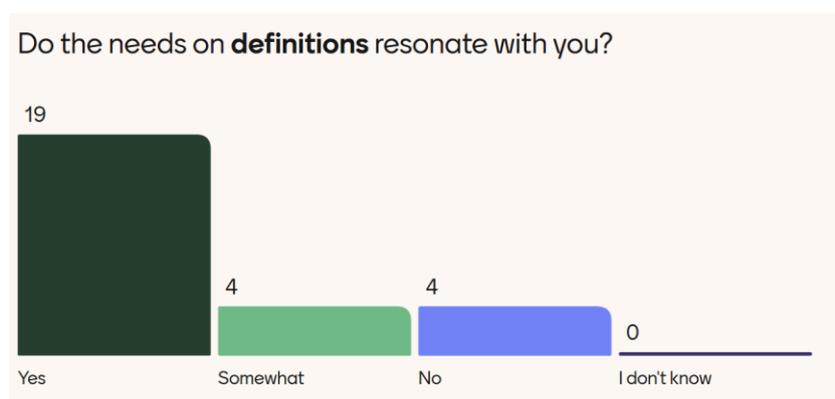


Figure 12 - MentiMeter result 4

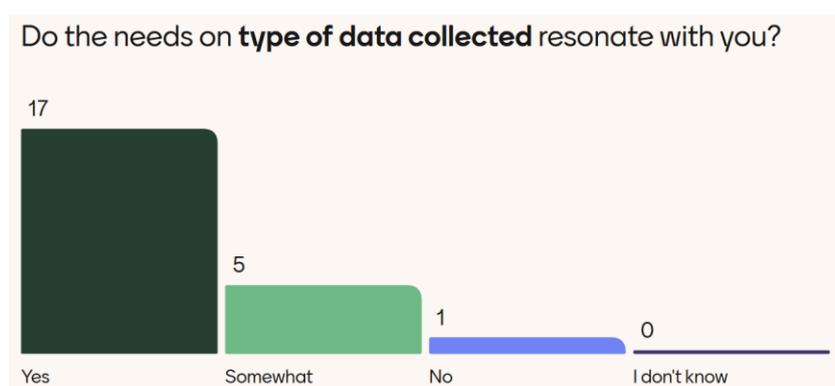
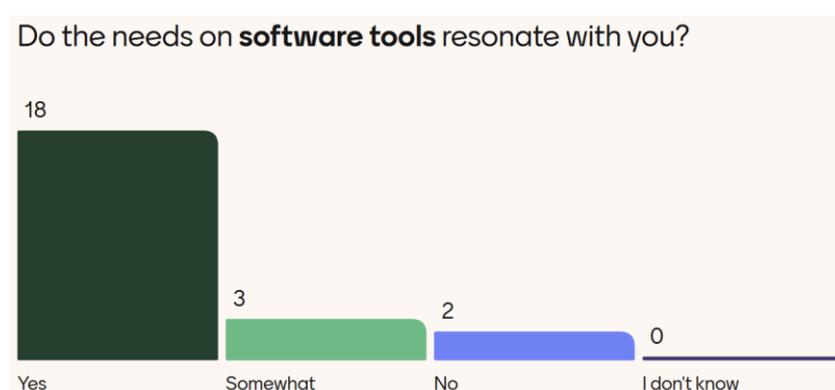


Figure 13 - MentiMeter result 5



Finally, the draft recommendations were also validated with the audience through the use of MentiMeter. First, the overall agreement with the presented recommendations was gauged (see MentiMeter result 5). Then, the audience was invited to rank draft recommendations based on their perceived relevance to their respective Member State (MentiMeter result 6). These views have, in particular, been taken into consideration in weighing and prioritising the recommendations presented in the final report.

Figure 14 - MentiMeter result 5

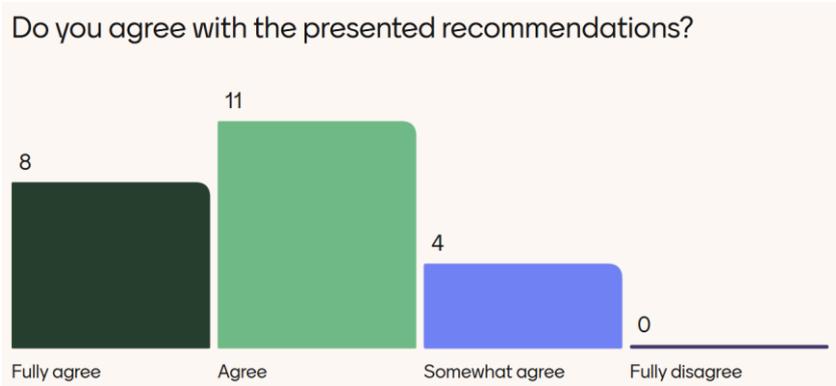


Figure 15 - MentiMeter result 6



# Annex III - Overview of self-assessed good practices by Member States

## Centralising data collection and fostering cooperation

- Clear legal mandate, designated coordinator that consolidates data and reports annually (Bulgaria).
- Within MIPROF system, associations cooperate based on a well-defined legal framework aligned with the French Criminal Code (France).
- Centralised database managed by the office of the national coordinator, which most important bodies from both the state and non-governmental sectors can access (Croatia).
- National Task Force on Combating Trafficking in Human Beings (Austria).
- High-level coordination by the national rapporteur chairing the Inter-ministerial Coordination Group where all the institutions involved in anti-trafficking cooperate and collect data (Czechia).
- NRM facilitating the secure and standardised collection of data from various stakeholders, including state authorities and non-governmental organisations (NGOs); the use of pre-defined reporting forms; the continuous training of frontline actors (Greece).
- Involvement of the German NGO Network against Trafficking in Human Beings (KOK) and its specialised counselling centres is a major strength, as well as the designation of the German Institute for Human Rights (DIMR) as the National Reporting Mechanism. Collaboration between multiple stakeholders ensures multiple data entry points. Enhancing data completeness (Germany).
- Limited number of stakeholders enables easy cooperation and verification of data (Luxembourg).
- Good communication between the NSO and all bodies it collects data from, and willingness to continue working on developing an MoU (Malta).
- Clear institutional responsibility ensuring systematic and annual compilation of data (Poland).
- Designation of the Ministry of Interior's Information Centre as the national coordinator has created a focal point for consolidating statistics (Slovakia).
- Anti-trafficking Office at the Ministry of Interior responsible for coordination and reporting of data, with an important role for the multi-stakeholder interdepartmental working group, which enables regular exchange of information (Slovenia).

## Good practices improving data collection

- Inclusion of improvement of trafficking data in the National Action Plan (Austria).
- Following the recent migration into the STAR system for victim support, the appointment of a designated in-house analyst in SKA has been critical for standardising data and improving data quality (Estonia).
- Cross-checking data from different sources helps prevent double-counting and strengthens the reliability of national statistics (Greece).
- Judiciary information system enables unique case tracking; GDPR/PDPA safeguards (Bulgaria).

- Standardised questionnaire is used and regularly updated (France).
- Data protection and privacy compliance are well integrated (Germany).
- Adopting a core set of variables resulted in more consistent reports, inter-agency coordination has been strengthened through formalised working groups, and data from NGOs and service providers have been systemically included (Italy).
- Close contact with relevant stakeholders who report on victims, also providing assistance to collect data on site if a stakeholder does not have time to do so (the Netherlands).
- Standardised information model used across the criminal justice system. In this way, data is entered in a common format. Another good practice is the micro-level administrative data collection, rather than aggregated statistics, enabling the centralised actor to verify and analyse the raw data (Sweden).
- Operative units do not need to conduct any separate processes of documentation for statistical reporting, as the data is extracted from the systems they work in. The NAS data collection and analysis process can be seen as a good practice (Finland).

### Databases as good examples

- Observatory on THB, which centralises most of the national information, is based on a strong NRM, and close working relationships with the data providers, including quarterly meetings (Portugal).
- MyEldo database, maintained by the 3 government approved-specialised centred for THB Victims (Belgium).
- Database developed by the Labour Inspectorate with detailed data on trafficking for labour exploitation, including sectors, regions and cities affected, indicators and age, sex, and nationality of presumed victims (Belgium).
- The International Protection Office database is an example of good practice of data keeping for other state agencies, as it allows easy extraction of relevant statistics, including on victims of trafficking seeking International Protection (Ireland).
- The register of Criminal acts contains detailed data on criminal offences, suspected persons and victims (Lithuania).

### High quality output of data

- Statistical monitoring of THB in an annual publication of data in the form of a consolidated report that covers at least the past 5 years, enabling identification of trends and developments over time (Spain).
- Annual reports of the national coordinator of THB Myria, which provide a thorough qualitative analysis of recent case law. In addition, it makes available all trafficking-related court decisions it receives (Belgium).
- High-level data is shared publicly in an accessible format on the website of The Centre against Human Trafficking (Denmark).
- Data collected by the SSMSI from police and gendarmerie records are highly reliable, built following rigorous methodological standards, thoroughly documented, and continuously

improved through advanced quality control and data validation processes. Also on the justice side, the Cassiopée and CJN systems provide efficient centralisation of judicial data. The Bureau of Information of the SSER ensures consistent extraction and processing of data, while analytical tools such as SAS and R allow for in-depth analysis of offenders and offences related to trafficking (France).

## Annex IV - Case study 1: Cooperation and collection of data from all relevant stakeholders at the national level

The case study is developed based on national research. Given the specificities of this study, no thorough analysis of the practices has been conducted. Where necessary, targeted follow-up questions to clarify elements of the case study are or will be posed to national consultants. Information provided or available on what is needed to put a certain practice in place is limited to such an extent that it has not been included in the case study.

General information	
<b>Case study 1</b>	Cooperation and collection of data from all relevant stakeholders at the national level
<b>Short description of the case study</b>	This case study zooms in on practices of Member States in organising the cooperation between stakeholders on the national level to collect data centrally. During the NACR workshop, participants voted 'cooperation and collection of data from all relevant stakeholders at the national level' as one of the most relevant case study topics. It is important to highlight that none of the presented examples work perfectly: every system has its flaws and elements to improve. Yet the practices showcase the different ways in which the cooperation and collection of data can succeed and serve as inspiration for others who still wish to enhance their own way of cooperating in the central data collection on THB.
<b>Short description of the issue or problem linked to the case study</b>	<p>The way data is coordinated and collected at the national level has a direct impact on the quality of national THB' statistics and, consequently, on the reliability of EU-wide figures. EU THB statistics can only be as robust as the national data that underlie them.</p> <p>As the report has shown, national data collection models differ considerably, shaping who is able to identify and record THB data, what types of information are captured, and which cases may remain invisible. By mapping and highlighting good examples of centralised and coordinated data collection systems, these case studies aim to provide practical insights and inspire other Member States seeking to strengthen and improve their own THB data collection frameworks.</p> <p>The practices follow <b>three of the identified data collection models</b>: (1) centralised data collection model with direct entry or access; (2) centralised data collection model based on data</p>

	extraction; (3) centralised data collection model with integrated submission.
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### Practice type 1 – Centralised data collection model with direct entry or access

<p><b>Practice 1A - Portugal</b></p>	<p><b>Portugal</b> uses two centralised but separate systems to collect data on THB, which are both established by law. Information is partly fed into these systems directly. The National Observatory on THB, operating since 2008 under the Ministry of Internal Administration, collects detailed, quarterly data on victims and exploitation through police inputs and standardised submissions from NGOs and other specialised actors (using devoted Excel sheets that are entered by the Observatory Team). It centralises most national THB data, has exclusive access to the full dataset, and is closely integrated with the NRM, which enhances data quality through trained data providers and regular coordination. Each quarter, data providers follow dedicated reporting procedures for the Observatory on THB. While this adds to their workload, it enables the collection of more detailed and comprehensive data, as the process is specifically designed to improve understanding of THB in Portugal. The Observatory on THB collects more detailed information than is listed in the Anti-Trafficking Directive and requested by Eurostat.</p> <p>Justice-related THB data are collected separately by the Directorate-General for Justice Policy through the Judicial Statistics Information System, which aggregates annually reported data on persons suspected, prosecuted, or convicted of THB from police, prosecutors, and courts. This system is highly automated, aligned with Eurostat reporting (except for exploitation types), and publishes aggregated results online, with access to full data limited to the statistical team.</p> <p>Both systems use algorithms and stakeholder meetings to prevent double-counting. However, because they operate independently and cases last multiple years, it is difficult to track how many cases identified by the Observatory result in prosecution or conviction. To address this, the Observatory on THB plans to launch an improved database in 2026 that will integrate data on victims as well as prosecuted and convicted persons, supported by targeted training for data providers to improve accuracy and analysis of judicial outcomes. This will significantly enhance both data collection and the depth of the data gathered.</p> <p><b>Strengths and added value (i.e. impact):</b></p> <ul style="list-style-type: none"> <li>• Both systems are established by law, which ensures a clear mandate and strengthens institutional ownership.</li> <li>• The Observatory’s quarterly, dedicated reporting procedures enable the collection of detailed and nuanced information</li> </ul>
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<b>Practice type 1 – Centralised data collection model with direct entry or access</b>	
	<p>that goes beyond EU minimum requirements (Anti-Trafficking Directive and Eurostat).</p> <ul style="list-style-type: none"> <li>• Integration with the NRM ensures that data are provided by trained professionals with expertise in victim identification and exploitation patterns.</li> <li>• Regular coordination meetings and the use of algorithms to detect potential double-counting enhance data reliability and consistency across providers.</li> <li>• Reduced reporting burden in the justice system: The automated data flows within the Judicial Statistics Information System minimise manual reporting and reduce errors.</li> </ul> <p><b>Limitations (i.e. impact):</b></p> <ul style="list-style-type: none"> <li>• Fragmentation between victim and justice data</li> <li>• The reporting to the Observatory via Excel sheets adds to the administrative burden for NGOs (police enter directly)</li> <li>• The absence of exploitation-type variables in justice statistics constrains detailed analysis of prosecution and conviction patterns by form of exploitation</li> </ul>
<b>Practice 1B - Croatia</b>	<p>In <b>Croatia</b>, the Office of the National Coordinator for Combating Trafficking in Human Beings is responsible for collecting THB data and managing the central THB database (based on the National Action Plan). The Office submits statistical data to the Central Bureau of Statistics, which processes and publishes official statistics and forwards the data to Eurostat. The central database is managed exclusively by the Office of the National Coordinator, which is the only body authorised to enter and manage data.</p> <p>Key stakeholders represented in the Operational Team on THB—including police, ministries, the State Attorney’s Office, inspectorate, and NGOs—have access to the database to monitor trends and developments but cannot input data themselves. The database is centralised, transparent, and regularly updated, which supports coordinated action and shared understanding of THB trends across state and non-state actors. While the system functions well, further development would benefit from the introduction of dedicated data analysis software to enhance analytical capacity.</p> <p><b>Strengths and added value (i.e. impact)</b></p> <ul style="list-style-type: none"> <li>• All relevant stakeholders part of the operational team have access to the database and thus insight into the phenomenon of THB</li> <li>• Data is updated regularly</li> </ul>

<b>Practice type 1 – Centralised data collection model with direct entry or access</b>	
	<ul style="list-style-type: none"> <li>• Close contact between the National Coordinator responsible for collecting and managing the data and the operational team</li> </ul> <p><b>Limitations (i.e. impact)</b></p> <ul style="list-style-type: none"> <li>• Lack of a legal basis for the data collection</li> <li>• Stakeholders can look into the database but cannot directly enter data, which might create reporting burdens (yet to be determined how the relevant stakeholders report data to the National Coordinator)</li> <li>• Still need for software to enhance analytical capacity.</li> </ul>
<b>Practice IC - Germany</b>	<p>Since November 2022, the German Institute for Human Rights (Deutsches Institut für Menschenrechte, DIMR) has been designated as <b>Germany's</b> National Reporting Mechanism (NRM) on trafficking in human beings, responsible for data coordination and official reporting, including to Eurostat. The mandate of the NRM at DIMR is not yet established through an act of parliament, relying instead on funding and the mandate of the Federal Ministry for Family Affairs, Senior Citizens, Women and Youth, which may affect its long-term sustainability and authority.</p> <p>DIMR manages a centralised data collection system that brings together information from federal and Länder authorities, law enforcement, and civil society organisations. The system uses a secure, user-friendly web interface and integrates data management software to support future monitoring and analysis. Strong safeguards are in place to protect victims' privacy, including anonymisation and privacy-by-design principles, supported by formal cooperation agreements with civil society partners. By combining law enforcement data with information from specialised NGOs and counselling centres, the system provides a broader picture of trafficking and victim support and enables biannual monitoring reports to parliament, as well as international reporting to Eurostat and bodies such as GRETA.</p> <p>KOK (German NGO Network against Trafficking in Human Beings) gathers data primarily through a jointly developed software tool called the KOK data tool. This tool is used by specialised counselling centres supporting trafficked persons, allowing them to input anonymised case data. The data collection process involves these centres entering detailed information about individual cases with the informed consent of clients, focusing on social and legal circumstances, rights enforcement, and access to support services. The data collected covers aspects such as victims' demographics, forms of exploitation, and their access to protection and legal aid.</p> <p>This approach emphasises a human rights-based perspective,</p>

### Practice type 1 – Centralised data collection model with direct entry or access

aiming to provide insights into victims' rights enforcement and gaps in policy and services. Although the data from KOK's tool is not fully representative of all trafficked persons (since it is only in relation to those known in the support system), it contributes significantly to understanding trafficking dynamics in Germany and supports evidence-based policy development.

#### Strengths and added value (i.e. impact)

- Central coordination with a human rights mandate: Locating the National Reporting Mechanism (NRM) at the German Institute for Human Rights ensures a strong human rights-based approach. This broadens the focus beyond criminal justice data to include victim protection, access to rights, and service gaps.
- Centralised pooling of diverse data sources: The system brings together data from federal and Länder authorities, law enforcement, and civil society. This improves overall coverage and provides a more complete picture of trafficking than law-enforcement data alone.
- Inclusion of NGO and counselling centre data: Through cooperation with KOK and the use of the KOK data tool, the system captures detailed, case-level information from specialised counselling centres.
- Strong data protection and trust: Privacy-by-design, anonymisation, and formal cooperation agreements help protect victims and build trust among NGOs, encouraging participation and honest reporting.
- Technically robust and future-oriented design: The secure web interface and integrated data management software support standardised data entry, monitoring, and future analytical use

#### Limitations (i.e. impact)

- Lack of a strong legal basis: The NRM's mandate is not established by an act of parliament. Reliance on ministerial designation and funding may weaken long-term sustainability and authority.
- Complex coordination requirements: Pooling data across multiple federal levels and sectors requires continuous coordination, harmonisation of definitions, and sustained stakeholder engagement.
- Data integration challenges: differences in data standards, case definitions, and recording practices across Länder and institutions can complicate comparability and analysis.
- Resource intensity: Maintaining secure IT infrastructure, data protection compliance, reporting cycles, and stakeholder cooperation requires sustained financial and human resources.

Practice type 1 – Centralised data collection model with direct entry or access	
<b>Practice ID - Estonia</b>	<p><b>Estonia</b> centralises THB coordination and data management under the Ministry of Justice, which serves as the national THB coordinator and compiles national data. Justice data on offences and offenders are managed through a single MoJ-led hub (Justiitsandmete andmebaas, JAAK), aggregating de-personalised records from police, prosecutors and courts, with prisons consulted as needed. Practitioners enter data directly in the system, while the Ministry controls, cleans, de-duplicates, analyses and publishes aggregated statistics.</p> <p>Victim data are centrally managed by the Social Insurance Board (SKA/VSS), which maintains a separate victim-assistance dataset and supplies identified/presumed victim figures for reporting. Data entry is currently limited to SKA staff; any future outsourced providers would submit structured statistics to SKA rather than access the system directly.</p> <p><b>Strengths and Values</b></p> <ul style="list-style-type: none"> <li>• Single justice-data hub (JAAK): Police, prosecution and court data flow into one central, MoJ-controlled system, ensuring coherence and comparability.</li> <li>• Decentralised input, central oversight: so-called “Authorised processors” (police, prosecutors, courts) enter data directly, while the Ministry consolidates, validates and analyses it.</li> <li>• Quality controls and analytics: De-duplication, case-by-case checks and use of BI tools (Tableau/Power BI) enhance reliability.</li> <li>• Stable victim-data governance: SKA’s control over victim data ensures confidentiality and uniform data entry standards.</li> </ul> <p><b>Limitations</b></p> <ul style="list-style-type: none"> <li>• Separated victim and justice datasets: Victim-service data (SKA) and justice data (MoJ/JAAK) must be combined ad hoc, increasing reporting effort.</li> <li>• Incomplete ecosystem integration: Labour Inspectorate and Border Guard administrative data are not included in Eurostat THB statistics, limiting insight into labour exploitation and migration-related THB.</li> <li>• Limited interoperability: No automated, real-time linkage between SKA and JAAK datasets.</li> </ul>

Practice type 2 – Centralised data collection model based on data extraction	
<b>Practice 2A - Finland</b>	<p>In <b>Finland</b>, Statistics Finland (STAT) is legally responsible for coordinating national THB data collection and reporting, including to Eurostat. STAT mainly extracts data from existing operational systems used by police (PATJA) and courts and prosecutors (AIPA),</p>

### Practice type 2 – Centralised data collection model based on data extraction

which reduces administrative burden and limits data loss. Personal identifiers are used at the raw-data level to prevent double-counting, though prosecution data collection has been discontinued. Victim data for Eurostat is currently provided via the National Police Board.

The National Assistance System for Victims of Human Trafficking (NAS), an independent part of the Finnish Immigration Service and covered by the Statistics Act, is often regarded as the “official statistics” used to monitor THB prevalence on a national level, and plays a central role in identifying victims and monitoring THB prevalence. NAS data, drawn directly from its client registry, covers all formally identified victims, including those not involved in criminal proceedings, and is widely regarded as a key national data source. However, NAS data is currently excluded from Eurostat reporting due to overlap with police data, though a process is underway to re-include NAS data for victims not registered by police, following developments under the EU-funded TILDA project.

Specialised NGOs also collect data, but victims who do not enter NAS—around 20% of those pre-identified by NGOs—remain outside official statistics. Overall, the Finnish system’s main strength lies in its automated extraction of anonymised statistics from routine operational systems, minimising extra workload and human error. Further improvements could come from fully integrating NAS and NGO data with STAT’s Eurostat reporting to provide a more comprehensive picture of THB prevalence.

#### Strengths and added value

- Strong legal mandate: Statistics Finland (STAT) and the National Assistance System for Victims of Human Trafficking (NAS) have a strong legal mandate in the Statistics Act.
- Use of existing operational systems: data is mainly extracted from systems already used in daily work (for STAT, those of the police (PATJA) and courts/prosecutors (AIPA) and for NAS, their own client registration system). This minimises additional administrative burden, reduces the risk of missing data, and limits human error.
- Prevention of double-counting: Access to personal identifiers at the raw-data level allows STAT to reliably identify individual victims and perpetrators, ensuring accurate de-duplication before anonymisation.
- Central role of the National Assistance System (NAS): NAS plays a key role in victim identification and prevalence monitoring. Its data covers all formally identified victims, including those outside criminal proceedings, offering a broader picture than law-enforcement data alone. The NAS is the result of an EU-funded TILDA project, to enable technical solutions to separate

<b>Practice type 2 – Centralised data collection model based on data extraction</b>	
	<p>NAS victim data from police data, paving the way for future inclusion of non-criminal-case victims in Eurostat reporting, provided that additional steps are taken to ensure this.</p> <p><b>Limitations</b></p> <ul style="list-style-type: none"> <li>• Incomplete coverage of victims: only formally identified victims are included in NAS data. Around 20% of NGO pre-identified victims who choose not to enter NAS remain invisible in official statistics.</li> <li>• STAT, NAS and NGOs collect data in parallel, but these datasets are not yet fully integrated, limiting a comprehensive national picture of THB prevalence.</li> <li>• Exclusion of NAS data from Eurostat reporting (to date): Due to overlap concerns, NAS data have so far been excluded from Eurostat reporting, resulting in underrepresentation of victims not involved in criminal proceedings.</li> <li>• Discontinued prosecution data collection: the termination of prosecution data collection from AIPA reduces insight into judicial follow-up and outcomes of THB cases.</li> <li>• Limited NGO data integration: while NGOs collect valuable information, their data is not systematically incorporated into national or EU-level statistics.</li> </ul>
<b>Practice 2B - Sweden</b>	<p>In <b>Sweden</b>, the National Council for Crime Prevention (Brå) is responsible for coordinating national data collection on THB, producing official crime statistics, and reporting to Eurostat. Brå compiles and processes standardised administrative data from across the criminal justice system, including the police, prosecution authority, courts, and customs. These agencies use a common information model in their case management systems, enabling seamless electronic data transfer, integration, and quality assurance.</p> <p>A key strength of the Swedish system is this standardised, micro-level data collection across the criminal justice chain, which minimises double-counting and ensures accurate recording of all formally identified victims. Brå integrates and processes the data, applies consistent statistical definitions, and stores it in a long-term database from which official statistics are produced. The system is underpinned by a strong legal framework based on the Act and Regulation on Official Statistics, allowing Brå to process sensitive personal data in compliance with GDPR.</p> <p>While other authorities (such as the Gender Equality Agency and the Migration Agency) and civil society organisations collect complementary information on presumed and assisted victims, these data are not integrated into Brå's official statistics due to concerns about overlap, data quality, and privacy. However, they</p>

### Practice type 2 – Centralised data collection model based on data extraction

are used for policy development, coordination, and victim support. Ongoing efforts focus on improving coordination, standardisation, and coding practices, as well as exploring the inclusion of information on the application of the NRM to better capture systemic responses to trafficking.

#### Strengths and added value (i.e. impact)

- Strong legal and institutional foundation: Brå's mandate is clearly established in the Act on Official Statistics and its Regulation, providing legal certainty, authority to process sensitive data, and long-term sustainability.
- Standardised information model across the criminal justice chain: The use of a common information model by police, prosecutors, and courts is a major strength. It enables seamless electronic data transfer, consistency in recording offences, suspects, and victims, and smooth case progression across institutions.
- Micro-level administrative data collection: Collecting case-level raw data rather than aggregated figures allows for detailed analysis, robust quality checks, and flexible statistical outputs.
- Effective prevention of double counting: Integrated case management and standardised identifiers minimise duplication and ensure that all formally identified victims are recorded accurately.
- Low additional burden on frontline staff: data is entered as part of routine case management, avoiding parallel reporting systems and reducing operational burden.
- Complementary use of non-criminal justice data for policy: although not included in official statistics, data from other agencies and civil society are still used to inform policy development, coordination, and victim support.

#### Limitations

- Narrow scope focused on formally identified victims: official statistics reflect only victims identified within the criminal justice system. Presumed victims identified by NGOs or social services remain excluded, limiting insight into overall prevalence.
- Limited integration of complementary data sources: Data from the Gender Equality Agency, Migration Agency, and NGOs are not integrated into Brå's statistics due to concerns over overlap, data quality, and privacy.

**Practice type 3 Centralised data collection(partly) based on stakeholder submission**
**Practice 3A - Greece**

In **Greece**, responsibility for coordinating THB statistics lies with the Office of the National Rapporteur on Combating Human Trafficking, under the Ministry of Foreign Affairs (Law 4781/2021). The Office has a coordination and reporting role: it collects data from public authorities (police, Ministry of Justice, Ministry of Migration, labour inspectorate) and private actors, transmits them to the Hellenic Statistical Authority (ELSTAT), and oversees submission to Eurostat, as well as preparation of the annual national report.

Operational data management is carried out by EKKA through the NRM/EMA. EKKA collects data on potential and identified victims using standardised forms completed by cooperating NGOs, while the police and Ministry of Justice provide data on suspects, prosecutions and convictions. EKKA cross-checks information from different sources to prevent double counting.

Data are submitted continuously as new cases arise, aggregated and processed annually (with interim updates if needed). The NRM/EMA maintains a central system for anonymised victim data, while judicial data are held in a separate Ministry of Justice platform; a fully unified and interoperable system has not yet been implemented.

Access and data entry is a mixed method of direct entry and data submission. Law enforcement, judicial authorities, ministries and the labour inspectorate can enter data directly into the NRM system. NGOs do not have direct system access; instead, they submit standardised reporting forms that are entered by authorised personnel.

**Strengths and added value**

- Multi-stakeholder data collection: Data are collected from law enforcement, judicial authorities, ministries, the labour inspectorate and NGOs, capturing both criminal-justice and victim-support dimensions.
- Strong civil society engagement: Despite the absence of a legal reporting obligation, most NGOs actively participate, reflecting trust in the NRM and strengthening victim-related data.
- Standardised reporting forms for NGOs: Improve comparability, consistency and victim anonymity.
- Cross-checking mechanisms: EKKA verifies data across sources (e.g. NGOs and police) to reduce double counting and improve reliability.

**Limitations**

- No legal obligation for NGOs to report: Participation is voluntary, leading to potential under-reporting by some NGOs and legal professionals.

**Practice type 3 Centralised data collection(partly) based on stakeholder submission**

- Lack of interoperability: Victim data (NRM/EMA) and judicial data (Ministry of Justice) are stored in separate systems, requiring manual coordination.
- No unified national platform: The absence of a fully interoperable, cross-sector system limits comprehensive analysis.
- Limited data-analysis expertise: The NRM does not employ dedicated data analysts; analysis is conducted by professionals from other disciplines (e.g. social workers).
- Indirect NGO data entry: NGOs cannot enter data directly into the system, which may delay processing and increase administrative workload for authorised staff.

## Annex V - Case study 2: Practices to avoid double-counting of victims

The case study is developed based on national research. Given the specificities of this study, no thorough analysis of the practices has been conducted. Where necessary, targeted follow-up questions to clarify elements of the case study are or will be posed to national consultants. Information provided or available on what is needed to put a certain practice in place is limited to such an extent that it has not been included in the case study.

General information	
<b>Case study 2</b>	Practices to avoid double-counting of victims
<b>Short description of the case study</b>	<p>The objective of this case study is to identify practices in Member States aimed at preventing double-counting. During the NACR workshop, participants voted that avoiding double-counting practices was one of the most relevant to their respective Member States.</p> <p>Based on the inputs collected through the Member State-level research, the practices at the centre stage of this case study are organised along two types, namely: <b>assigning unique identifiers to victims and/or offenders</b> and <b>the use of algorithms</b>. It should be noted that a number of Member States reported working with data cleaning and manual case-by-case verification. While this is a common practice that answers a clear need, it does not necessarily consider an innovative practice that is worth highlighting within the scope of this study and case study. It is therefore suggested not to include these practices in this case study. Furthermore, Member States that shared information on potentially relevant practices but only to a very limited extent have been excluded from the case study (i.e. Lithuania and the Netherlands).<sup>150</sup></p>
<b>Short description of the issue or problem linked to the case study</b>	<p>The issue of double-counting in the collection of human trafficking statistics in the EU refers to the risk that the same victim, incident, or case is recorded more than once in official data. This problem makes it difficult to produce accurate, comparable, and reliable figures across member states. Double-counting occurs due to the way data is collected, shared, and categorised at national and EU levels.</p>

<sup>150</sup> In Lithuania, the Register of Criminal Acts has built-in software tools that prevent duplicate data entries, as each record is assigned a unique identification code. In the Netherlands the data that the National Rapporteur receives from CoMensha already has been checked on duplicates. CoMensha works with birth of date, nationality and place of birth. If necessary, also initials will be checked if possible. If it's still impossible to ensure double counting the person is added to the list of 'not-registered persons'. The investigative services work with a program in which 'entities' are recorded. This program is used to check whether suspects are also involved in other investigations and by doing so, avoiding double-counting.

### Practice type 1 - Assigning unique identifiers to victims and / or offenders

#### Practice 1A - Bulgaria

**Bulgaria** has a centralised database managed by the national AT agency (NCCTHB), but with limited data providers, including institutions such as the Prosecution Service (БКП), the Ministry of Interior, and other state bodies. They transmit aggregate, anonymised figures rather than individual case records. There is no direct external access, and no specialised analytical software.

Victims and offenders are assigned anonymised unique identifiers within each institution that provides the data. For example, the national Prosecution Service applies its own internal case registration system (Unified Information System of the Judiciary), which ensures that each criminal case and identified victim has a single procedural record.

NCCTHB cross-checks records using demographic and case information to identify and remove duplicates. Double counting is avoided primarily by relying on aggregate, prosecution-based statistics and by centralising reporting within the NCCTHB. Only the NCCTHB Secretariat consolidates the data. For NCCTHB annual reports, these data are counted once, at the stage when a victim is formally recognised in criminal proceedings, reducing the chance of the same person being reported multiple times from different institutions.

#### **Strengths and added value (i.e. impact):**

- Centralised database managed by one authority (NCCTHB).
- Unique identifiers for each victim/case within institutions.
- Cross-checks to remove duplicates before reporting.
- Aggregate, prosecution-based statistics: only formally recognised victims are counted.
- Single point of data consolidation ensures consistency.

#### **Limitations (i.e. impact):**

- It was reported that this practice also might narrow the dataset, meaning that the system prevents duplication at the cost of data completeness.
- Additionally, it was commented that this also leads to underreporting, as some categories of victims are effectively excluded rather than double-counted.
- Moreover, in practice, differences remain between victim numbers recorded by NGOs, social services, and law enforcement, since presumed victims identified outside of criminal proceedings are not always included in the central database. There are cases when it is not clear if a certain counted presumed victim of THB is a person counted formally by the prosecution and investigative services. Also, one victim – initially presumed and later on

<b>Practice type 1 - Assigning unique identifiers to victims and / or offenders</b>	
	formally identified – might be shared within statistical data from one or more NGOs and later on by the prosecution, and thus will be counted more than once and reported by the NCCTHB.
<b>Practice 1B - Greece</b>	<p>In <b>Greece</b>, the NRM/EMA avoids double counting of individuals through systematic data verification and the assignment of unique anonymised codes to each victim. Organisations (data providers) use predefined identification fields, such as date of birth, gender and country of origin, to ensure that the same individual is not recorded more than once. After receiving the data reports from the data providers, NRM experts will cross-check the cases whether there is not too much common information with another case before confirming with the data providers that it is not the same case.</p> <p><b>Strengths and added value (i.e. impact):</b></p> <ul style="list-style-type: none"> <li>• Each victim gets a unique anonymised code.</li> <li>• Data providers use set fields (e.g. date of birth, gender, country of origin) to identify individuals.</li> <li>• NRM experts systematically cross-check and verify cases to avoid duplicates.</li> </ul> <p><b>Limitations (i.e. impact):</b></p> <ul style="list-style-type: none"> <li>• Reports without consensus are the riskier ones, because they don't get the unique code.</li> <li>• It is more important to collect reports even without consent and then double-check than to only collect cases with complete information and the victim's consent.</li> </ul>
<b>Practice 1C - Italy</b>	<p>In <b>Italy</b> a general level, double-counting of victims is avoided by using, for statistical purposes and to be shared with Eurostat, only the data from the SIRIT system — not the data on victims identified in criminal proceedings and collected by the Ministry of the Interior — as the SIRIT data are more comprehensive. More specifically, in the SIRIT system, each assisted person is assigned a unique code, and any transfers between projects are tracked within the same system. This ensures that individuals are not counted more than once, even if they receive support in different regions or at different times.</p> <p><b>Strengths and added value (i.e. impact):</b></p> <ul style="list-style-type: none"> <li>• Only SIRIT system data (comprehensive, not just criminal justice) is used for statistics.</li> <li>• Each assisted person gets a unique code; all transfers are tracked in the same system.</li> <li>• Prevents double counting even if support is given in different regions/times.</li> </ul>

**Practice type 1 - Assigning unique identifiers to victims and / or offenders**

	<p><b>Limitations (i.e. impact):</b></p> <ul style="list-style-type: none"> <li>• Victims not in SIRIT (e.g. only in criminal proceedings) may be excluded, risking undercounting.</li> <li>• Full integration with other data sources may be limited.</li> </ul>
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**Practice type 2 - Use of algorithms**

<p><b>Practice 2A - Portugal</b></p>	<p>In <b>Portugal</b>, there are two main data collectors and data providers: the national Observatory on THB and the Directorate-General for Justice Policy. Both rely on database algorithms to identify potential double counting. These algorithms use variables such as the date of events, types of crime, victims' nationalities, forms of exploitation, and cities of exploitation to cluster similar cases for further analysis and evaluation of possible duplications. In addition, the Observatory conducts meetings with all stakeholders to verify and cross-check potential duplicates. The Directorate-General for Justice Policy also holds meetings for this purpose, although these are limited to police forces.</p> <p><b>Strengths and added value (i.e. impact):</b></p> <ul style="list-style-type: none"> <li>• The use of algorithms by both data providers helps to avoid double counting.</li> </ul> <p><b>Limitations (i.e. impact):</b></p> <ul style="list-style-type: none"> <li>• Portugal has, in fact, two centralised systems: the <b>Observatory on THB</b> and the <b>Directorate-General for Justice Policy</b>, with different timelines of analysis and distinct types of information, which may create challenges in correlating the data collected by both. Both systems rely on other professionals, services, civil society organisations, and citizens to refer THB cases that will then be investigated or receive assistance. Although the information provided by the Directorate-General for Justice Policy makes it possible to determine how many THB trials and convictions occur each year, judicial proceedings often take more than one year to be concluded. As a result, it is not easy to correlate the number of suspects with the number of convictions—or with the number of victims—in a given reporting period.</li> <li>• One of the main areas the Observatory on THB has identified as needing improvement is the availability of information on the number of cases prosecuted as THB, as well as the number of convictions and convicted persons. The Portuguese National Plans on THB have acknowledged the need to establish mechanisms to provide this information to the Observatory, in order to produce reports that can, for example, assess the conviction rate in THB</li> </ul>
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Practice type 2 - Use of algorithms	
	<p>cases or the rate of prosecution. Measures are being put in place to that end.</p>
<b>Practice 2B - Spain</b>	<p>In <b>Spain</b>, the BD-Trata system, managed by the National Rapporteur on Trafficking in Human Beings, <b>incorporates multiple validation filters</b> designed to prevent the double counting of victims.</p> <p>To prevent errors, the causes of discrepancies are reviewed on a case-by-case basis. Double counting is generally avoided, as the data reported by the Prosecutor's Office typically refers to formally identified victims. Furthermore, the Office has established agreements with the judicial police, whereby any investigation related to THB is reported using a standardised form, facilitating accurate and consistent data entry into the platform.</p> <p><b>Strengths and added value (i.e. impact):</b></p> <ul style="list-style-type: none"> <li>• The system's data exploitation and analysis tools allow for error detection and cross-checking between platforms. According to the Rapporteur, approximately 3,000 data quality monitoring interventions are carried out annually to ensure the accuracy and reliability of the information presented.</li> </ul> <p><b>Limitations (i.e. impact):</b></p> <ul style="list-style-type: none"> <li>• Challenges persist in the reporting of data to Eurostat. One recurring issue is that the total number of reported victims does not always correspond to the sum of victims disaggregated by type of exploitation. This is due to the fact that some individuals may have experienced multiple forms of exploitation—such as labour and sexual exploitation—but are counted only once in the overall victim total, in accordance with Eurostat's single-count methodology.</li> <li>• In the case of the Human Trafficking and Immigration Prosecutor's Office, the platform is still undergoing refinement, and certain deficiencies are being addressed.</li> </ul>

## About Ecorys

**Ecorys** is one of Europe's oldest and largest independent economic research and consulting companies. With offices in 12 countries, including the Netherlands, Belgium, Poland, Croatia, Italy and Spain, and liaisons and representatives in many others (e.g. India, Turkey and the United Kingdom), we have access to an [extensive European network of experts](#). Ecorys manages contracts and projects for various Directorate Generals (DGs) and European institutions. For many years, Ecorys led multiple framework contracts on impact assessments, evaluations and evaluation-related services in the area of migration and home affairs. As such, we have ample experience implementing specific contracts for DG HOME.

During the last four-year FWC for DG HOME, we collaborated with Deloitte on the [EU security market study](#), where we played a leading role in the development of the mapping and catalogue of stakeholders and a taxonomy of the market of security products and services. This was based on our past work on developing statistical data on the [European security technology and industrial base](#) for DG GROW. Subsequently, we also provided support on the deep dive study for DG HOME on [critical infrastructure](#). Prior to this, Ecorys implemented studies under previous DG HOME FWCs on internal security.

In the area of [migration and external border management](#), we conducted a feasibility study on a forecasting and early warning tool for migration based on artificial intelligence technology. We also conducted the study to gather best practices from information and awareness-raising campaigns aimed at preventing irregular migration and migrant smuggling conducted by EU institutions and EU Member States, as well as the study on reviewing the functioning of Member States' National and Transnational Referral Mechanisms. Further, we conducted the evaluation of the regulation establishing a network of Immigration Liaison Officers. We also conducted a feasibility study on lowering the fingerprinting age for children and on storing a copy of the visa applicants' travel documents in the Visa Information System (VIS).

In the area of [crisis management](#), Ecorys took care of the Programme Management Office (PMO) of the International Forum for the Advancement of First Responder Innovation. For multiple years, we supported DG HOME on activities supporting the consolidation of the Community of Users on Secure, Safe, and Resilient Society in the CBRN-E and Crisis Management Areas. We also led the work on first responders, identifying capability gaps and corresponding technology requirements in the EU, as well as the project DRIVER which focused on driving innovation in crisis management for European Resilience.

In addition to this, Ecorys has for many years provided consultancy services and technical assistance to DG HOME in the field of the [fight against and prevention of corruption](#). In recent years, we delivered a series of studies directly and indirectly related to corruption and anti-corruption policies, such as several studies in the European Public Prosecutors Office (EPPO) on behalf of DG JUST, two studies on corruption in the EU Healthcare Sector (2013 and 2017), and a study on corruption in procurement

with EU funds (on behalf of OLAF, 2014). Currently, in collaboration with partners, we are conducting the ex-post and interim evaluation of the ISF funds.

Ecorys, as a research consultancy, is also actively involved as a partner in various ISF-funded research projects, inter alia, on [cybercrime](#), [corruption and organised crime](#), and [firearms](#). We prepared several technical briefs for DG HOME on [explosives precursors](#), and we conducted a study on [high-risk groups for trafficking in human beings](#). We also conducted impact assessments and evaluations for other relevant DGs and EU institutions and agencies in the area of justice and home affairs. For the European Parliament, we conducted studies on [child sexual abuse](#), [human trafficking](#), [critical infrastructure protection](#), [CBRN threats](#), and [migration](#). For DG TAXUD, we conducted studies and evaluations on [hidden wealth in offshore financial centres](#), [VAT fraud](#) regulations, and PERICLES – the [anti-euro counterfeiting](#) financial instruments. For CEPOL, we evaluated the use of services in the area of [police cooperation](#). For the European Union Agency for Asylum, we supported the development of country-of-origin reports on push and pull factors for migrants. For the Fundamental Rights Agency, we conducted a study on [artificial intelligence](#), big data, and its impact on [fundamental rights](#) in the EU. For DG ECHO, we supported on peer reviews in the framework of EU [cooperation on civil protection and disaster management](#), as well as setting up and managing the network of European Hubs for Civil Protection and Crisis Management. For DG GROW, we evaluated the [drug precursors](#) regulation, and for DG EAC we conducted a study on [illicit trade in cultural goods](#). For DG ECFIN we performed a study on [cash payment restrictions and terrorism financing](#), and money laundering. For DG JUST, we conducted various studies, such as an impact assessment on a new legislative instrument on [illicit drug trafficking](#), a study on typology and policy responses to [child begging](#) in the EU, a study on [missing children](#) in the EU, an impact assessment of establishing the [European Public Prosecutor's Office](#), an [EU fraud](#) impact assessment on OLAF. For DG REGIO, we ran the [Urban Agenda on security](#) in public spaces partnerships.

Ecorys also has a track record in studies on behalf of municipalities, ministries, and (international) NGOs in the [rule of law](#), [organised crime](#), [anti-money laundering](#), [asset recovery](#) and [financial investigation](#). In completing the projects above, Ecorys has gained an excellent all-around understanding of the critical issues, opportunities, and challenges in implementing programmes in these areas. Furthermore, Ecorys has considerable experience running large-scale and multi-annual Technical Assistance projects for the European Commission, mostly from its Brussels base.

We value our [independence](#), [our integrity and our partners](#). We care about the [environment](#) in which we work and live. We have an active Corporate Social Responsibility policy, which aims to create shared value that benefits society and business. We are [ISO 14001 certified](#), supported by all our staff.

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**Consultancy, technical  
assistance and support for the  
EU Anti-Trafficking Hub - Year 1**



Client: DG from Migration and Home Affairs  
Date and location