SWOT Analysis

EMBRACE – Empowering Business Communities to Prevent Labour Trafficking

101199034-EMBRACE-AMIF-2024-TF2-AG-THB

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Funded by the European Union

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List of abbreviations

AMIF — Asylum, Migration and Integration Fund
BFBHR — Balgarska Fondatsia za Biznesa i Pravata na Choveka (Bulgarian Foundation for Business and Human Rights)
BHR — Business and Human Rights
BRC — Bulgarian Red Cross
CAS — Centri di Accoglienza Straordinaria (extraordinary reception centres, Italy)
CBSS — Council of the Baltic Sea States
CGIL — Confederazione Generale Italiana del Lavoro
CSDDD (CS3D) — Corporate Sustainability Due Diligence Directive
CSO — Civil Society Organisation
CSRD — Corporate Sustainability Reporting Directive
DDAs — Direzioni Distrettuali Antimafia (District Anti-Mafia Directorates, Italy)
DNA — Direzione Nazionale Antimafia e Antiterrorismo (National Anti-Mafia and Anti-Terrorism Directorate, Italy)
DPCM — Decreto del Presidente del Consiglio dei Ministri (Decree of the President of the Council of Ministers, Italy)
EKKA — National Centre for Social Solidarity (Greece)
EMPACT — European Multidisciplinary Platform Against Criminal Threats
ERGANI — Greek labour information system
ESF+ — European Social Fund Plus
ESG — Environmental, Social and Governance
EUCPN — European Crime Prevention Network
EURES — European Employment Services (European Commission)
EUROPOL — European Union Agency for Law Enforcement Cooperation
EUROSTAT — Statistical Office of the European Union
FAR — Foundation for Access to Rights (Bulgaria)
GRETA — Group of Experts on Action against Trafficking in Human Beings
GSEE — Geniki Synomospondia Ergaton Elladas (Greek General Confederation of Labour)
GUS — Główny Urząd Statystyczny (Central Statistical Office, Poland)
HORECA — Hotels, Restaurants, Cafés
ICT — Information and Communication Technology
ILO — International Labour Organization
IMT — Inter-Ministerial Team for Counteracting Trafficking in Human Beings (Poland)
INL — Ispettorato Nazionale del Lavoro (National Labour Inspectorate, Italy)
IOM — International Organization for Migration
IRIS — International Recruitment Integrity System
KAS — Krajowa Administracja Skarbowa (National Revenue and Customs Administration, Poland)
KCIK — Krajowe Centrum Interwencyjno-Konsultacyjne dla Ofiar Handlu Ludźmi (Poland)

KRAZ — Krajowy Rejestr Agencji Zatrudnienia (National Register of Employment Agencies, Poland)
MRPiPS — Ministerstwo Rodziny, Pracy i Polityki Społecznej (Ministry of Family, Labour and Social Policy, Poland)
MSWiA — Ministerstwo Spraw Wewnętrznych i Administracji (Ministry of the Interior and Administration, Poland)
NAP — National Action Plan (against Human Trafficking)
NCCTHB — National Commission for Combating Trafficking in Human Beings (Bulgaria)
NGO — Non-Governmental Organisation
NRM — National Referral Mechanism
OECD — Organisation for Economic Co-operation and Development
ONR — Office of the National Rapporteur (Greece)
OPZZ — Ogólnopolskie Porozumienie Związków Zawodowych (All-Poland Alliance of Trade Unions)
PIP — Państwowa Inspekcja Pracy (State Labour Inspection, Poland)
PROCAP — standby protection capacity project
PSZ — Publiczne Służby Zatrudnienia (Public Employment Services, Poland)
RBC — Responsible Business Conduct
SAI — Sistema di Accoglienza e Integrazione (Reception and Integration System, Italy)
SIRIT — *Sistema Informatizzato di Raccolta Informazioni sulla Tratta* (Italian national information system on trafficking)
SME — Small and Medium-sized Enterprise
THB — Trafficking in Human Beings
TUI — Testo Unico sull'Immigrazione (Consolidated Immigration Act, Italy)
UN — United Nations
UNHCR — United Nations High Commissioner for Refugees
UOKiK — Urząd Ochrony Konkurencji i Konsumentów (Office of Competition and Consumer Protection, Poland)
VAS — Value-added services (logistics outsourcing, Italy)
ZUS — Zakład Ubezpieczeń Społecznych (Social Insurance Institution, Poland)

Introduction

This analysis presents the main insights from a mapping exercise conducted in **Greece**, **Italy**, **Bulgaria**, and **Poland**, exploring the risks of labour trafficking faced by migrant workers within national labour systems. It provides an overview of labour market trafficking in the four countries, with a focus on identifying high-risk regions and economic sectors where exploitation is more likely to occur. Furthermore, the analysis offers a synthesis of international and national legal and institutional frameworks in place. The second section of this document reports the main insights gathered during the **stakeholder consultations** held in 2026 in the four countries, drawing on the perspectives of businesses, labour inspectors, public authorities, CSOs, and other key stakeholders, alongside the voices of people with a migratory background. Finally, the SWOT outlines the main strengths and good practices, as well as gaps, opportunities, and threats related to the identification, reporting, prevention, and combating of labour trafficking.

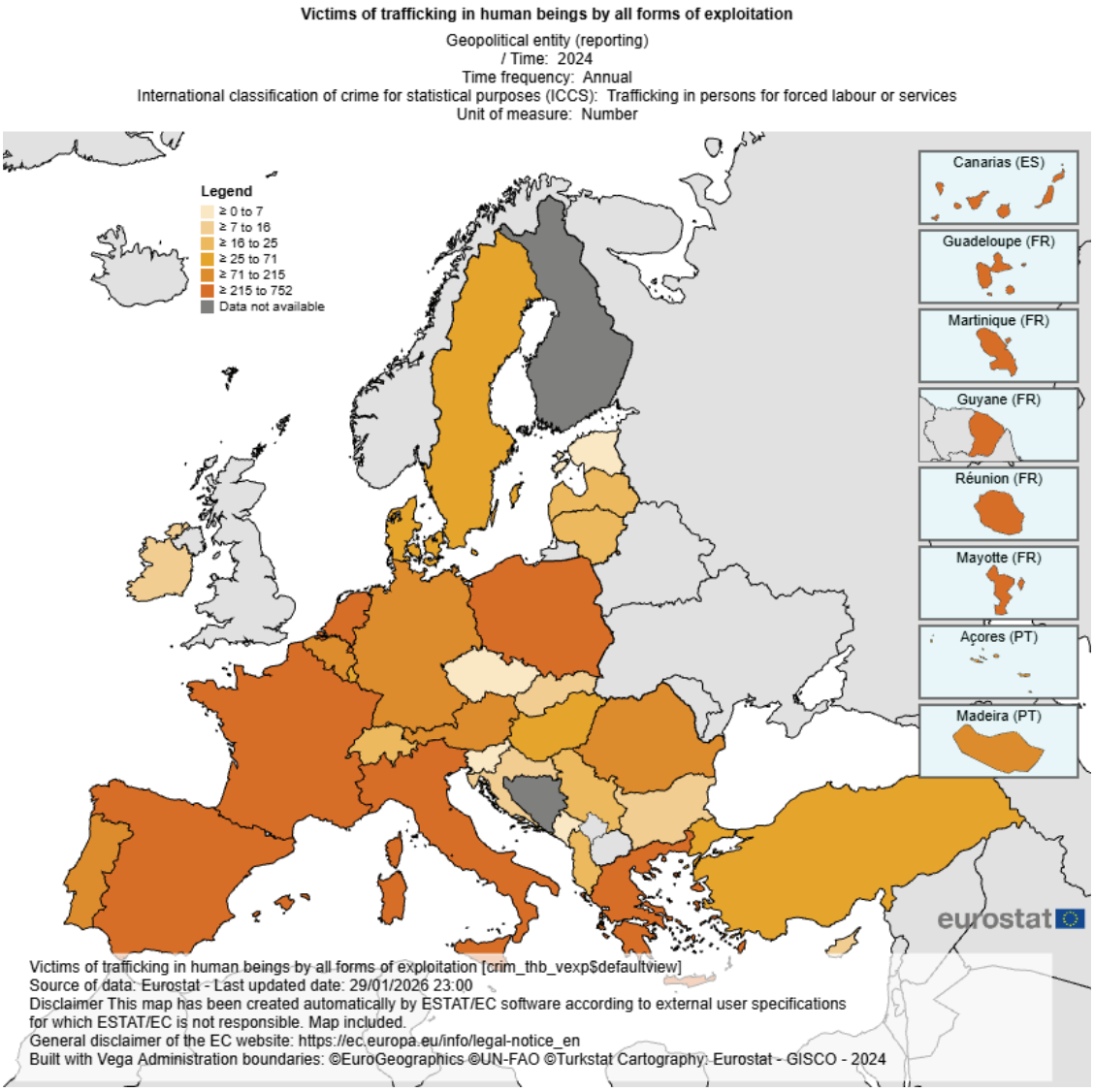


Figure 1. Trafficking in persons for forced labour and services, 2024 (number of persons), Source: Eurostat (2026c)

The mapping covered four EMBRACE partner countries (Greece, Italy, Bulgaria, and Poland), examining the current landscape of labour market trafficking and identifying the areas **and** sectors where vulnerability and exploitation are most prevalent. **Greece** and **Italy**, located on the southern border of the EU, represent major **destination** and **transit** countries. **In Greece**, trafficking in human beings (THB) for labour exploitation has been an emerging trend. It is described primarily as a country of **destination** and **transit**, and to a lesser extent of **origin**, with Greek nationals identified mainly as victims of internal trafficking. (Office of the National Rapporteur on Human Trafficking (ONR) and National Centre for Social Solidarity (EKKA), 2025) Contributing factors include high numbers of undocumented migrants, informal and seasonal dependent work, and systemic weaknesses in the labour market, combined with high demand for personnel in labour-intensive sectors.

In **Italy**, labour exploitation remains one of the most widespread and deeply rooted forms of modern slavery. The country is recognised not only as a **primary destination** for trafficked persons arriving through the Mediterranean, but also as a major **transit** point for victims moving onward to other European states. Its location places Italy at the forefront of complex migration dynamics, with thousands of migrants arriving by sea each year. These mixed movements, combining refugees, asylum seekers, and irregular migrants, often blur the boundaries between voluntary migration and trafficking. (Group of Experts on Action against Trafficking in Human Beings (GRETA), 2024)

In **Bulgaria** and **Poland**, persistent labour shortages in key sectors are the main driver of labour migration into the country. **Bulgaria** is described as a country of **origin** and **transit** for trafficked persons and is increasingly becoming a **destination** for vulnerable migrants, refugees and asylum seekers (GRETA, 2025). **Labour shortages** in several sectors are leading employers to look increasingly for staff from third countries, who are employed notably in agriculture and tourism (EURES, 2025). GRETA's fourth evaluation report notes a rise in identified victims of forced labour, who are mostly men, although sexual exploitation remains the predominant form among identified victims (GRETA, 2025).

In the 1990s and early 2000s, **Poland** was mainly a country of **origin** for migrant workers, with migration largely directed towards Western Europe. Following EU accession in 2004, emigration intensified, with the United Kingdom replacing Germany as the main destination and Ireland among the first countries to open its labour market (Iglicka and Ziółek-Skrzypczak, 2010). Over the past decade, Poland has become an increasingly **attractive destination for economic migrants**. Sustained labour shortages linked to population decline and low unemployment have intensified **demand for foreign workers** across both low- and high-skilled sectors.

Statistics

Trafficking in human beings for labour exploitation is now one of the two main forms of trafficking in the **European Union**. In 2024, Eurostat recorded 9,678 registered victims of trafficking. Among those whose form of exploitation was reported, 3,391 (37%) were trafficked for forced labour and 4,219 (46%) for sexual exploitation (Eurostat, 2026a). Most registered victims came from outside the EU (64%), while 28% were nationals of the registering country and 8% came from other EU countries (Eurostat, 2026b).

Greece

In **Greece**, the National Referral Mechanism for the Protection of Human Trafficking Victims (NRM) has recorded cases since 2019, and its 2025 annual report covers the period from 1 January to 31 December 2025, based on reporting and monitoring forms submitted by participating actors until 31 January 2026. After a relatively stable start, with 154, 167 and 157 cases in 2019, 2020 and 2021, case numbers rose to 358 in 2022 and 533 in 2023, dipped to 465 in 2024 and **reached 881 in 2025**, nearly double the previous year. Of the 881 victims, 773 were adults, and 108 were children. By sex assigned at birth, 449 were women and girls, and 432 were men and boys, the latter including two trans women. (ONR and EKKA, 2026)

The majority of female adult victims (213) were under the age of 25, while the majority (158) of male adult victims were between 26 and 35 years old. The sharp rise in labour exploitation incidence in Greece is partly linked to major police operations in agricultural areas, which led to the detection of 131 foreign nationals. Among adult victims of labour exploitation (495 in total), men were the large majority (68%), mostly in the **agricultural sector**, while women were mostly exploited in **domestic servitude**. Most adult **female** victims came from **African countries** (327 of 421), while **most** adult male victims came from **Asian countries** (257 of 352), principally **Nepal**. Across all adult victims, regardless of the form of exploitation, the main countries of origin were **Nepal** (197), **Sierra Leone** (178), **Somalia** (68) and **Cameroon** (49). Victims also came from non-EU European countries (e.g. **Albania**, **Moldova**), EU Member States (e.g. **Bulgaria**, **Romania**) and, in smaller numbers, **South America** (Colombia, Brazil, Paraguay).

Most adult victims (494 of 773) were asylum applicants, 199 were without documents, and 18 had refugee status. Many of the workers came from South and Southeast Asia, recruited while living and working in other southeastern European countries and then smuggled into Greece. In 2025, 11 victims reported to the NRM in previous years were formally recognised as trafficking victims by the prosecutor's order: in seven of these cases the victims filed a report with the Hellenic Police, and in the remaining four the order was issued through the so-called social path. Moreover, in 32 newly reported cases, adult victims were granted victim status after filing a report with the Hellenic Police, following the dismantling of criminal groups; the large majority of these cases concerned labour exploitation in agriculture. (ONR and EKKA, 2026)

Italy

In **Italy**, on 1 January 2025, the foreign presence totalled 5,898,000 people. Most of them, 5,371,251, were officially resident, accounting for **9.1% of the resident population**. A further 188,000 were regularly present but not registered in the population registers, and an estimated 339,000 were in an irregular situation. **Romanians** were by far the largest community (1,053,042, 19.6%), followed by **Albanians** (414,622, 7.7%) and **Moroccans** (412,457, 7.7%). **Chinese** (311,250, 5.8%) and **Ukrainian** citizens (287,187, 5.3%) rank fourth and fifth, followed by citizens of **Bangladesh** (213,622, 4.0%), **Egypt** (174,141, 3.2%), **India** (171,429, 3.2%), **Pakistan** (171,179, 3.2%) and the **Philippines** (153,455, 2.9%). (Blangiardo, 2026)

The gender composition differs sharply by community. Women predominate among Ukrainians (74.9%), Poles (74.2%) and Moldovans (66.6%), a pattern the report links to **domestic work** and **personal care**. Men predominate among citizens of **Pakistan** (74.4%), **Bangladesh** (74.1%), **Senegal** (73.1%) and **Egypt** (68.4%), groups described as mainly economic migrants often employed in jobs requiring physical strength, such as **construction**, trade and **agriculture**. (Blangiardo, 2026) Foreigners represent a key component of the Italian labour market. In 2024, they made up **11% of the active labour force**, a contribution that has become structurally



essential given the country's ageing population and shrinking domestic workforce (Zanfrini, 2026).

Migrants in an irregular situation are particularly exposed to trafficking in human beings (THB) for labour exploitation and to other forms of labour exploitation. Regular status, however, does not remove the risk. Asylum seekers may work legally two months after filing their application, yet many take informal jobs earlier, which increases their exposure to trafficking (U.S. Department of State, 2024). Entry through the ***decreto flussi***, the quota system governing the entry of non-EU workers, has become another channel of vulnerability. In 2025, the national anti-trafficking helpline received 161 first calls about people defrauded in connection with this system, equal to 30.7% of its first calls for help and reports. About 95% were **men**, mostly from **North Africa** and **South Asia**. They had arrived less than a year earlier with a work visa and authorisation, often after paying intermediaries, only to find that the promised employer or job did not exist (Numero Verde Antitratta, 2026). Detected cases reflect this shift. In 2025, anti-trafficking projects carried out 3,444 new assessments, 20.5% more than in 2024. For the first time since the system was created, men outnumbered women (52.5% against 44.5%, with 3.0% transgender persons), and minors accounted for 5.1%. The report links the change to the growth of severe labour exploitation, where men represent 90.6% of cases. Labour exploitation also accounted for 69.8% of the reports and requests for help received by the helpline. Among the 845 persons taken in charge, 42.1% had experienced severe labour exploitation. (Numero Verde Antitratta, 2026)

The largest national groups among persons assessed were **Nigerian** (18.1%) and **Bangladeshi** (15.7%), followed by **Moroccan** (10.3%), **Tunisian** (8.2%), **Ivorian** (7.1%), **Pakistani** (6.4%), **Indian** (4.3%) and **Egyptian** (4.1%). The main referral channels were the international protection system (22.4%), self-referrals (14.6%), extraordinary reception centres (CAS, 8.2%) and socio-health services (7.1%) (Numero Verde Antitratta, 2026). Yet detected cases capture only a fraction of the phenomenon: an estimated 15,000 to 20,000 people are at risk of THB in Italy, far more than the number of formally identified victims (GRETA, 2024).

Bulgaria

Bulgaria's labour force crisis is turning a country that remains primarily one of **origin** and **transit** for trafficked persons into an increasingly important **destination** for migrant workers, with an estimated 67,000 third-country workers present in Bulgaria (GRETA, 2025). In the first half of 2025, the Bulgarian Employment Agency permitted labour market access to 24,279 third-country nationals. The largest numbers came from **Uzbekistan** (5,696), **Turkey** (4,380), **Kyrgyzstan** (3,120), **Nepal** (2,272), **India** (1,508) and **Bangladesh** (1,350). Foreigners who received an **EU Blue Card** residence and work permit numbered 430. They were highly qualified specialists in ICT, trade, construction and manufacturing, mostly in expert, managerial and engineering positions, with the largest number from Russia (177), followed by Turkey (48), Ukraine (27) and India (26). (Naydenova, 2025)

Recorded trafficking cases, however, still mostly concern Bulgarian nationals. According to GRETA (2025), the Prosecutor's Office recorded **98 victims** in pre-trial proceedings in 2024, compared with 89 in 2023 and 153 in 2022. These figures are considerably lower than those of 2020 and 2021 (457 and 466), but the decrease largely reflects a **change in counting methodology** introduced in 2022, when statistics began to include only victims identified in newly opened proceedings. All victims recorded in 2024 were Bulgarian nationals. Sexual exploitation was the most common form (64%), followed by forced labour (19%, male



prevailing), trafficking of pregnant women for the sale of newborns (9%) and servitude (7%). Child victims averaged about 7% per year. Foreign victims are nonetheless identified: in 2024, the NCCTHB **informally identified 11**, eight of them in labour exploitation, from **Nepal**, the **Philippines**, **Turkmenistan**, **Morocco** and **Bangladesh** (GRETA, 2025).

GRETA (2025) also identified recruitment practices as a key vulnerability. Foreign agencies recruiting for Bulgaria are largely unregulated, while workers may incur high recruitment fees, debt and fraudulent contracts, often provided only in Bulgarian and after arrival. Trade unions also reported unpaid work, contract substitution and passport confiscation. EMBRACE stakeholder consultations (2026) highlighted growing recruitment from Uzbekistan, Nepal, Bangladesh and Kyrgyzstan, often through intermediaries and with significant debts incurred in countries of origin. Those considered most at risk include third-country nationals, refugees and people under temporary protection, seasonal workers, unaccompanied minors and young people ageing out of protection, and persons already in Bulgaria who remain outside effective institutional visibility.

Poland

In **Poland**, at the end of January 2026, there were **1,119.0 thousand foreigners performing work**, 7.1% more than a year earlier. **Ukrainian** citizens were the largest group, with 757.7 thousand, or 67.7% of the total, followed by **Belarusians**, **Indians**, **Georgians**, **Colombians** and **Filipinos** (Statistics Poland, 2026). Under the Act of 12 March 2022 on assistance to Ukrainian citizens, Ukrainians legally staying in Poland, including beneficiaries of temporary protection, have free access to the labour market, provided that the employer notifies the labour office (Ministry of Family, Labour and Social Policy (MRPiPS), 2025a). In 2024, 322,941 work permits were issued in Poland. The largest groups were citizens of the Philippines (37,988), Colombia (37,987) and India (33,928) (MRPiPS, 2025a).

According to GRETA (2023), **labour exploitation** had emerged as the main form of exploitation among victims identified by the Border Guard and the National Prosecutor's Office, notably in **construction**, **agriculture** and **manufacturing**, ahead of sexual exploitation. **Temporary employment agencies** mediate access to temporary labour for user-employers. GRETA (2023) also notes a trend of **temporary employment agencies recruiting** workers in **Latin American** countries using deception, and reports a growing number of victims, mainly of labour exploitation, originating from Latin America in 2021-2022, in particular from **Guatemala**, **Colombia**, **Venezuela** and **Mexico**. La Strada Foundation (Fundacja La Strada, 2024) reported recruitment also in **Southeast Asia**. As the foreign workforce has grown and diversified, identifying trafficking in human beings (THB) for labour exploitation has become an increasingly relevant challenge. According to data from the **National Public Prosecutor's Office** presented in the **Polish National Action Plan Against Trafficking in Human Beings 2025-2027**, the number of identified victims fell from 447 in 2021 (30 minors) to 277 in 2022 (25 minors), before rising sharply to **1,043 in 2023** (11 minors). In 2023, 680 victims were **Polish** citizens, the largest group by a wide margin. Among foreign nationals, the highest numbers were recorded for **Colombia** (125) and **Guatemala** (75), followed by **Moldova** (55) and **Venezuela** (32), with smaller numbers for **Mexico** (22), **Ukraine** (14), **Georgia** (12) and **Vietnam** (6). (Inter-Ministerial Team for Counteracting Trafficking in Human Beings (IMT), 2025)

Regional and sectoral distribution

Labour trafficking clusters in specific sectors and areas of each country, mostly where irregular work, seasonal demand and dependence on migrant labour coincide. The paragraphs below describe where and in which sectors exploitation is most often reported or most likely to occur. Across the four countries, migrant employment and incidents of labour exploitation concentrate mainly in **agriculture** and **domestic work**.



Figure 2. Main sectors named in the country analyses (Greece, Italy, Bulgaria, Poland). Larger and darker words indicate sectors named in more countries. Source: EMBRACE SWOT

In **Greece** in 2025, labour exploitation was the predominant form of exploitation among the cases reported to the **National Referral Mechanism**, with **543** cases in total, of which 495 concerned adult victims. Men accounted for 68% of the victims of labour exploitation. Labour exploitation was the dominant form among male victims (93%), mainly in the **agricultural** sector, and affected 35% of female victims, mainly in the form of **domestic servitude**. Multiple forms of exploitation were recorded in 44 cases, two of them involving children, most often labour exploitation combined with forced marriage or with sexual exploitation (13 cases each). The high number of recorded cases of labour exploitation that took place in Greece is linked to major police operations carried out exclusively in **agricultural** areas, which led to the detection and rescue of **131 foreign nationals**. Most of them were citizens of **South** and **Southeast Asian countries** (mainly Nepal, Indonesia and India) who were already residing and working in other South-Eastern European countries (Romania, Bulgaria, Serbia, North Macedonia and Croatia) when traffickers approached them with the intention of transporting them illegally to Greece for further exploitation. (ONR and EKKA, 2026)

Similarly, in **Italy**, foreign workers are particularly present in **agriculture**, **construction** and **domestic work**, and migrant labour is often concentrated in low-skilled, precarious jobs. Migrants make up the majority (69.5%) of the nearly 900,000 formally employed domestic workers, while undeclared work in the sector is estimated at 51.8%. Beyond home-based care, migrants work in personal and **community services** (30.4%), **agriculture** (18%), **hospitality** and **tourism** (17.4%) and **construction** (16.4%) (Zanfrini, 2026). Trafficking for labour exploitation clusters in sectors with the highest levels of irregular work and a strong dependence on migrant labour. GRETA (2024) names **agriculture**, **domestic work**, **textile manufacturing**, **catering**, **construction** and **car washes** as the highest-risk sectors, and investigations into **agriculture** are the most numerous. In agriculture, exploitation runs largely through ***caporalato***, criminalised by Article 603 bis of the Criminal Code as the recruitment of workers for third parties under

exploitative conditions, taking advantage of their state of need. In the **South**, measures for migrant agricultural workers have targeted **Puglia**, **Basilicata**, **Calabria**, **Campania** and **Sicily**. The labour inspectorate and IOM project ALT CAPORALATO (2019-2021) covered **agriculture**, **logistics**, **construction** and **manufacturing** also in **Abruzzo**, **Emilia-Romagna**, **Lazio**, **Lombardy**, **Marche**, **Piedmont**, **Tuscany**, **Umbria** and **Veneto.** In **Piedmont**, inspectors investigated **textile workshops** employing **Chinese** workers. (GRETA, 2024) In 2025, evaluations across all forms of exploitation concentrate in **Sicily** (545), **Emilia-Romagna** (430), **Lombardy** (419), **Veneto** (370), **Piedmont** (298) and **Lazio** (283) (Numero Verde Antitratta, 2026).

Bulgaria is increasingly becoming a **destination** country for migrant workers, driven by labour shortages across several sectors. Third-country nationals still make up a small share of the active workforce. They are recruited mainly for **agriculture**, **food processing**, **hospitality** and **garment** manufacturing. In the **North-West**, which is affected by ageing and emigration, they work mainly in **agriculture** and **meat processing**. On the **Black Sea coast**, **hospitality** and **tourism** rely on **seasonal recruitment**, particularly around Varna and in the **South-East**. GRETA (2025) identifies **agriculture** and **construction** as sectors where men from poorer areas are at risk of forced labour, and reports exploitation of migrant workers in **tourism**, **sewing** and **metal** processing. It also reports internal exploitation of Bulgarian victims in **Sofia**, other **large cities**, **Black Sea** and **mountain resort areas** and **border towns**, as well as concerns about labour exploitation among Ukrainian refugees accommodated in hotels along the Black Sea coast. Stakeholders consulted in the EMBRACE meetings confirmed construction, agriculture, manufacturing and HORECA, along with domestic work, as high-risk sectors.

Labour trafficking in **Poland** is most prevalent in **agriculture** and **food processing**, **construction**, **domestic work**, **hospitality** and **manufacturing** (Fundacja La Strada, 2024). GRETA (2023) also notes victims identified in **construction**, **agriculture** and **manufacturing**. The cases it describes also involve **fish processing**, **fast food restaurants**, a **farm** and **truck drivers** from the **Philippines** employed by a Polish company to work mainly in the Netherlands. (GRETA, 2023) No clear geographical hotspots are identified, as foreign workers are present in all counties, largely because employment agencies supply labour to companies nationwide. Reported case concentrations appear to reflect variations in detection and enforcement capacity rather than the actual scale of exploitation, so cases are identified more often where monitoring mechanisms are strongest (Fundacja La Strada, 2024).

Legal and Policy Framework

International context

The project partner countries, **Greece**, **Italy**, **Bulgaria**, and **Poland**, as member states of both the **Council of Europe** and **the European Union**, are subject to a robust regional legal framework aimed at preventing forced labour and trafficking in human beings. **The** **European Convention on Human Rights** (1950), under Article 4, explicitly prohibits slavery, servitude, and forced or compulsory labour, with compliance monitored by the **European Court of Human Rights**. All four countries have also ratified the **Council of Europe Convention on Action against Trafficking in Human Beings**, which offers a comprehensive approach to prevention, victim protection, and prosecution.

All partner countries, as EU member states, are required to comply with the **Charter of Fundamental Rights of the European Union**, which under Article 5 explicitly prohibits trafficking

in human beings. EU Member States are also bound by **Directive 2011/36/EU,** preventing and combating trafficking in human beings and protecting its victims. This Directive harmonises the definition of trafficking offences and penalties, introduces a victim-centred and gender-sensitive approach, addresses prevention, including demand reduction, and reinforces coordination among national authorities.

Recently, two EU instruments have a direct bearing on corporate responsibility for preventing exploitation along value chains. The first is the **CSDDD (Directive (EU) 2024/1760)**, which introduces human rights and environmental due diligence obligations for very large companies operating in the EU market, as amended by the Omnibus I package in 2026. The second is Regulation (EU) 2024/3015, which prohibits placing on the Union market products made with forced labour. It entered into force on 13 December 2024 and applies from 14 December 2027.

Furthermore, the European Union is a party to the **United Nations Convention against Transnational Organised Crime**, adopted by General Assembly resolution 55/25 of 15 November 2000 and opened for signature in Palermo in December 2000. It is the main international instrument against transnational organised crime and entered into force on 29 September 2003.

Beyond the EU framework, the four countries have ratified a comprehensive set of **United Nations and International Labour Organization** conventions and protocols that form the cornerstone of the global legal framework against human trafficking, slavery, and the exploitation of children. These are the **Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children**, supplementing the **United Nations Convention against Transnational Organized Crime (2000)**, the Slavery Convention (1926), and the Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery (1956).

Country	C029Forced Labour (1930)	P029Protocol to C029 (2014)	C105Abolition of Forced Labour (1957)	C109 Wage, Hours of Work (Sea) (1958)	C129 Labour Inspection (Agriculture) (1969)	C143 Migrant Workers Convention, 1975	C181Private Employment Agencies (1997)	C182Worst Forms of Child Labour (1999)	C189Domestic Workers (2011)
Greece	Yes	Yes*	Yes	No	No	No	No	Yes	No
Italy	Yes	Yes*	Yes	No	Yes	Yes	Yes	Yes	Yes
Bulgaria	Yes	No	Yes	No	No	No	Yes	Yes	No
Poland	Yes	Yes	Yes	No	Yes	No	Yes	Yes	No

Figure 3. Ratification of Selected ILO Instruments by Country, Status as of October 2026. Source: International Labour Organisation (ILO, n.d.), UNHCR (2024)
*Legend: Yes = Ratified | No = Not ratified | * Ratified but not in force yet*

None of the four countries has ratified the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, adopted by the UN General Assembly in 1990 (resolution 45/158) and in force since 2003. EU law protects regular migrants through several directives and national frameworks. The main gap concerns undocumented migrants, whose protection rests partly on Directive 2009/52/EC, which provides for employer sanctions, recovery of unpaid wages and complaint mechanisms, and on general instruments such as the Anti-Trafficking Directive. The UN Convention addresses this gap in part: its Part III guarantees basic human rights to all migrant workers regardless of status, including freedom from forced labour (Article 11) and equal conditions of work even where the stay or

employment is irregular (Article 25), while the additional rights in Part IV are reserved for workers in a regular situation.

National Legal and Policy Framework

Greece

Greece has established a comprehensive legal framework against human trafficking, closely aligned with EU and international standards. The main legal provision governing trafficking in human beings (THB) in Greece is Article 323A of the Penal Code (2019) (EUCPN, 2019). Several other provisions of the Penal Code are also relevant, including those on the sexual abuse of minors and those applying to acts committed both nationally and internationally, regardless of whether such acts are criminalised in the jurisdiction where they occurred. Concrete provisions to address various forms of human trafficking, including labour exploitation, were first introduced by Law 3064/2002, which regulates crimes related to sexual and human trafficking. The framework is complemented by Law 3811/2009, which established the Hellenic Compensation Authority for victims of violent crime, including trafficking; Law 4216/2013, which ratified the Council of Europe Convention on Action against Trafficking in Human Beings; and Law 4478/2017, which transposed Directive 2012/29/EU on the rights, support and protection of victims of crime. Victim recognition and protection are further regulated by Law 5038/2023 (Migration Code) together with Presidential Decree 233/2003, which govern the issuance of formal acts recognising victims of THB (Article 4(ia)), provide a residence permit option for victims of abusive working conditions (Article 134), and establish a recovery and reflection period for victims of trafficking (Article 135).

Furthermore, Law 5038/2023 (**Migration Code**), Articles 135-142 regulate the **issuance**, **renewal**, **withdrawal**, and **modification** of **residence permits** granted on humanitarian grounds to **victims of human trafficking**. This process operates independently of asylum procedures and is available to third-country nationals officially recognised as victims by a public prosecutor, who may also initiate criminal proceedings against perpetrators. These provisions ensure that victims have access to legal residence, protection, and rights, including healthcare, social assistance, and employment. Law 4808/2021 (Law for the Protection of Labour) reinforces **equal treatment in employment** and establishes the **Independent Labour Inspectorate**, responsible for detecting undeclared work and labour exploitation. Equally, Law 4554/2018 (Against Undeclared Employment) establishes joint and several liability within subcontracting chains to ensure accountability for wages and social security contributions. Notably, Law 4052/2012 harmonises Greek legislation with EU Directive 2009/52/EC and regulates issues of **criminal liability and sanctions** (imprisonment of at least five months, or at least six months when the victims are minors) for employers found guilty of repeated violations.

In response to persistent labour shortages and high levels of informal employment, Greece has introduced additional measures to regulate migrant labour: Law 5078/2023 introduced a temporary legalisation scheme that allowed undocumented third-country nationals residing in Greece before 30 November 2023 to regularise their status by proving at least three years of continuous residence. The regularisation window closed at the end of 2024. Greece has also sought to fill labour gaps through **bilateral agreements** with countries such as **Bangladesh** and **Egypt**, enabling the legal employment of foreign nationals in key economic sectors, including **agriculture** and **construction** (Generation 2.0 RED and SolidarityNow, 2025).

Greece's corporate accountability and supply chain transparency framework is primarily shaped by the EU Corporate Sustainability Reporting Directive (CSRD), transposed into Law 5164/2024. This law requires large companies to report on environmental, social, and governance (ESG) issues, including risks of labour exploitation and human rights violations in their operations and supply chains.

Institutional and coordination mechanisms to combat THB in Greece involve the **judicial** and **prosecutorial authorities**, the law enforcement authorities, and the Labour Inspectorate, which conducts inspections and collaborates with EUROPOL and the European Labour Authority on cross-border operations.

The Office of the National Rapporteur on Trafficking in Human Beings (ONR) is the national coordinating authority in Greece, operating under the Ministry of Foreign Affairs. Its mandate includes developing and monitoring **the national anti-trafficking strategy**, coordinating relevant actors, and ensuring policy coherence across public institutions and civil society. "*The ONR the ONR/Ministry of Foreign Affairs has set up two working groups to update the National Action Plan, considering the EU Strategy on Combating Trafficking in Human Beings (2021-2025), the amendment of the Anti-Trafficking Directive and the recommendations of all relevant international organizations ...* " (ONR and EKKA, 2025, p. 3).

Under Law 4198/2013, the **National Referral Mechanism** (NRM) was established and is managed by the National Centre for Social Solidarity (E.K.K.A.). It became operational on 01/01/2019 and is mandated to identify, refer and support victims of trafficking. The NRM ensures cooperation among public authorities, NGOs, and international organisations, with a strong focus on a victim-centred and human rights-based approach.

Greece's first **National Action Plan** (2013-2017) set up the institutional framework for anti-trafficking policy, harmonised national law with EU directives, created the ONR, and laid the groundwork for the NRM, creating *"a large network of different stakeholders to get involved in the fight against THB from the public and private sector"* (European Commission, n.d.). The second Plan (2019-2023) focused on improving inter-agency cooperation, expanding specialised training, and strengthening engagement with the NRM. Although a new plan has not yet been adopted, EU Directive 2024/1712 is expected to guide the development of the next one.

Italy

Italy's national legislative and institutional framework to combat human trafficking and labour exploitation has developed substantially over the past decade, yet implementation challenges persist. The central legal instrument is Legislative Decree 24/2014, which transposes the EU **Anti-Trafficking Directive** 2011/36/EU and provides a comprehensive definition of trafficking in human beings, encompassing sexual, labour, and other forms of exploitation. This decree complements the **Criminal Code**, particularly Article 601 (trafficking in persons) and Article 603-bis (illegal intermediation and labour exploitation), the latter reformed by Law 199/2016 to strengthen sanctions against *caporalato* networks. Additional relevant legislation includes the **Consolidated Immigration Law (Legislative Decree 286/1998, *'Testo Unico'*)**, which regulates the entry, residence, employment, and social and civil rights of foreign nationals and stateless persons, and governs residence permits for victims of trafficking and/or labour exploitation. Article 18 governs the issuance of a **residence permit for special cases to victims of trafficking**, violence, or serious exploitation. Law 173/2020 reformed Article 19 of Legislative Decree 286/1998, broadening the scope of application of special protection and giving weight, among

other things, to respect for private and family life. Additionally, Law 47/2017 introduced in Italy a comprehensive protection system for unaccompanied foreign minors. It prohibits their refoulement at the border, sets a uniform procedure for identification and age assessment, and limits first reception to 30 days. It also creates a system of voluntary guardians, gives priority to family foster care, and guarantees access to health care, education and legal assistance, with enhanced protection for child victims of trafficking.

The most recent law (Law 187/2024) introduces important measures against labour exploitation and ***caporalato*** in Italy. It creates a new special residence permit for foreign workers who are victims of illegal recruitment and labour exploitation, allowing them to access assistance, training, and legal employment, and so possibly motivating them to report exploitation. The law also strengthens penalties for those involved in illegal labour intermediation and exploitation. Although it focuses mainly on *caporalato*, its protection mechanisms also benefit people who may be victims of trafficking for labour exploitation.

From a **policy perspective**, the GRETA evaluation (GRETA, 2024) notes that Italy has adopted several national strategies to coordinate anti-trafficking measures. The National Action Plan against Trafficking and Serious Exploitation of Human Beings 2022–2025 builds on the previous plan (2016–2018) and outlines actions in prevention, protection, prosecution, and partnership (*Dipartimento per le Pari Opportunità - Presidenza del Consiglio dei Ministri*, 2022). It also annexes the **National Referral Mechanism** and **Guidelines for Rapid Identification of Victims of Labour Exploitation in Agriculture**. The National Referral Mechanism (NRM) establishes the national governance model for the anti-trafficking system, regulating the procedures for identifying, referring and taking charge of victims of trafficking and serious exploitation through the competent services. The National Guidelines for the identification, protection and assistance of victims of labour exploitation in agriculture (Ministry of Labour and Social Policies, 2021) set out minimum standards and general principles for a publicly led national referral mechanism aimed at identifying, protecting and assisting victims of labour exploitation in agriculture, and specify the roles and responsibilities of the institutional actors involved.

Parallel to this, the National Plan to Combat Labour Exploitation and Illegal Recruitment in Agriculture (2020–2022) established an inter-institutional committee, the *Tavolo Caporalato*, under the Ministry of Labour and Social Policies, to coordinate interventions and monitor progress. These frameworks represent positive steps toward an integrated response; however, their impact is constrained by limited funding, fragmented coordination, and insufficient performance indicators (European Labour Authority, 2022).

In July 2026, Legislative Decree 115/2026 entered into force, transposing Directive (EU) 2024/1712, strengthening victim identification through enhanced training and coordination, enabling operators to recognise the objective indicators of trafficking, violence or serious exploitation. It also introduced the right to a 45-day recovery and reflection period, during which repatriation cannot be carried out, and transitional assistance measures are guaranteed.

Institutionally, the **Department for Equal Opportunities** within the Presidency of the Council of Ministers serves as both the national coordinator and the body equivalent to a national rapporteur on trafficking. It oversees 21 regional anti-trafficking projects under the "Single Programme for the Detection, Assistance, and Social Integration of Victims of Trafficking and Exploitation," implemented through partnerships between public authorities and specialised NGOs. The **National Labour Inspectorate** plays a crucial role in detecting labour exploitation, but

its effectiveness is limited by staff shortages, resource constraints, and restricted powers, particularly in informal or semi-legal sectors, despite progress in engaging multi-agency inspection teams and cultural mediators. Overall, Italy's anti-trafficking framework is legally robust but operationally fragmented. Although legislation is broadly aligned with international standards, enforcement is weakened by poor inter-institutional coordination and limited labour inspection capacity. (GRETA, 2024)

Highly relevant for the labour market is the ***decreti flussi***, Italy's mechanism for regulating the legal entry of non-EU workers. Each decree sets **annual quotas**, broken down by sector and sometimes by country of origin. An employer applies for an authorisation within these quotas, and once granted, the worker obtains an entry visa and then a residence permit tied to that job. The legal basis is the *Testo Unico sull'Immigrazione* (Legislative Decree 286/1998), and the current framework is set by the multi-year DPCM for 2026–2028. The system is designed as a safeguard, yet when quotas are too tight, procedures too slow, and contracts fictitious, it manufactures the dependence and irregularity that turn ordinary exploitation into trafficking. Stakeholders consulted in the EMBRACE meetings in Italy identified it as both part of the problem and a potential lever for prevention.

Bulgaria

In Bulgaria, the legal framework for combating trafficking in human beings (THB) is founded on the Constitution of the Republic of Bulgaria. It is complemented by a comprehensive body of legislation: The Criminal Code, the Labour Code, the Combating Trafficking in Human Beings Act (2003), the Labour Migration and Labour Mobility Act, the Foreigners in the Republic of Bulgaria Act, the Asylum and Refugees Act, the Health and Safety at Work Act, the Employment Promotion Act, and secondary legislation regulating labour mediation services. Together, these legal instruments provide the national framework for preventing and combating trafficking in human beings, protecting and assisting victims, regulating labour migration, and safeguarding workers' rights.

The **National Commission for Combating Trafficking in Human Beings** (NCCTHB) coordinates the implementation of national anti-trafficking policies, prevention activities, victim protection and assistance, and the **National Referral Mechanism** (NRM). Criminal liability for trafficking in human beings is established under
Articles 159a–159d of the Criminal Code:
Article 159a: criminalises recruiting, transporting, harbouring or receiving persons for sexual exploitation, forced labour, begging, organ removal or forced subjection, regardless of the victim's consent.
Article 159b: covers trafficking across the state border.
Article 159c: punishes anyone who knowingly uses the services of a trafficking victim.
Article 159d: provides for 5–15 years' imprisonment, heavy fines and confiscation of property where the offence involves dangerous recidivism or an organised criminal group.

Operational responsibilities are shared among the Ministry of Interior, the Ministry of Labour and Social Policy, the Ministry of Foreign Affairs, the Prosecutor's Office of the Republic of Bulgaria, the Employment Agency, the Executive Agency "General Labour Inspectorate", the State Agency for Child Protection, and other competent authorities. Employers' organisations, trade unions and civil society organisations, including Animus Association Foundation, the Bulgarian Red Cross (BRC), the Foundation for Access to Rights (FAR), and Mission Wings

Foundation, complement state efforts through prevention activities, legal assistance, victim support, awareness-raising initiatives, and professional training.

As highlighted during the EMBRACE stakeholder consultations (2026), Bulgaria is currently undertaking legislative initiatives aimed at aligning its national legal framework with Directive (EU) 2024/1712, amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims. In this context, amendments to the **Combating Trafficking in Human Beings Act** are under discussion to strengthen procedures for the early identification and referral of victims, improve interinstitutional cooperation, reinforce the National Referral Mechanism, expand measures for victim protection and assistance, and enhance the collection and analysis of statistical data. The proposed reforms also aim to address emerging forms of exploitation, including those facilitated through information and communication technologies, strengthen the liability of legal persons, and introduce additional preventive measures to reduce the demand that fosters exploitation.

At the same time, amendments to the Foreigners in the Republic of Bulgaria Act, the Labour Migration and Labour Mobility Act, and the Asylum and Refugees Act are under discussion. These initiatives seek to strengthen the legal safeguards available to third-country nationals and applicants for, or beneficiaries of, international protection who may be at heightened risk of labour exploitation or trafficking in human beings. The proposed changes include improving the governance of labour migration, strengthening oversight of employers and labour intermediaries, enhancing migrant workers' access to information on their labour rights, reinforcing labour inspections, and improving mechanisms for early identification and protection.

Poland

Poland

Poland lacked a comprehensive migration strategy for many years as it was not a political priority. Only on 15 October 2024 was the current migration policy, “Regain Control. Ensure Security,” adopted. It established a **Comprehensive and Responsible Migration Strategy for Poland for the Years 2025–2030**, which seeks to enhance national security, prevent a mass influx of third-country nationals, and respond to labour market needs.

On the other hand, Poland has a broad **national legal and institutional framework** addressing labour trafficking, combining **criminal law** (Code of Criminal Procedure - Act of 6 June 1997, Executive Penal Code - Act of 6 June 1997, the Act on the Liability of Collective Entities for Prohibited Acts Punishable by a Penalty), **labour regulation** (Act of 20 March 2025 on the Labour Market and Employment Services), **migration law** (Act of 12 December 2013 on Foreigners, Act of 13 June 2003 on Granting Protection to Foreigners, Act of 14 July 2006 on the Entry, Stay and Departure of EU Citizens and their Families, Act of 12 March 2022 on Assistance to Ukrainian Citizens), **victim protection** (Act of 7 July 2005 on State Compensation for Victims of Certain Prohibited Acts, Act of 28 November 2014 on the Protection and Assistance for the Injured Party and Witness, Act of 14 December 2018 on the Protection of Personal Data Processed for Crime Prevention), and **social assistance** (Act of 12 March 2004 on Social Assistance, Act of 24 April 2003 on Public Benefit Activity and Volunteerism, Act of 5 August 2015 on Free Legal Assistance).

Trafficking is criminalised under the Criminal Code. Coordination is ensured through **National Action Plans** and the **National Referral Mechanism**.

Poland has recently strengthened protection of migrant workers through the **Act of 20 March 2025 on the Labour Market and Employment Services**, which introduces key safeguards such as mandatory written and translated contracts, a ban on recruitment fees, and clearer information on rights and obligations. It also tightens registration requirements for employment agencies.

EU supply-chain transparency legislation, including the Corporate Sustainability Due Diligence Directive, the Corporate Sustainability Reporting Directive, the Sustainable Finance Disclosure Regulation, and the Forced Labour Ban Regulation, plays an increasingly important role in preventing forced labour by strengthening transparency and mandatory human-rights due diligence across companies and their supply chains. As these legislative instruments are recent, their impact cannot yet be fully evaluated.

The Act of 15 June 2012 on the Consequences of Entrusting Work to Foreigners Unlawfully Residing in Poland introduces subcontracting-related safeguards by establishing conditional and joint liability for contractors where illegal employment occurs unless due diligence has been exercised. However, Poland has not criminalised the use of services linked to forced labour, nor does it provide for effective criminal liability of legal persons. Rules further tighten oversight of temporary employment agencies hiring foreigners.

In Poland, anti-trafficking policy is coordinated by **the Interministerial Team for Combating Trafficking in Human Beings**. The Team prepares and monitors the National Action Plans and operates through two permanent working groups, one on victim support and one on monitoring the implementation of the National Action Plan. Its members include representatives of key ministries, enforcement bodies and selected public institutions, international organisations, academia, and specialised NGOs.

Implementation of the national policy rests on several instruments. The National Referral Mechanism for Victims of Trafficking (NRM) (*Krajowy Mechanizm Referencyjny*) ensures effective cooperation among all stakeholders involved in combating human trafficking. Strategic direction is provided by multi-year National Action Plans, the most recent being the National Action Plan for the Prevention of Trafficking in Human Beings (2025–2027), which sets current priorities. These are complemented by the National Strategy for Poverty Reduction and Promotion of Social Inclusion 2030 and the National Human Rights Action Plan.

The National Labour Inspectorate (PIP) is the main authority enforcing labour law and detecting labour exploitation. According to PIP's Summary of Activities 2025, complaint-driven inspections numbered 22,700, almost 40% of all inspections. In 2025, PIP also carried out inspections of strategic investments and subcontracting chains employing foreign workers: 155 inspections covered 1,668 foreign nationals from 27 countries and uncovered 737 cases of illegal entrustment of work, mainly due to missing work authorisation. The workers most affected were nationals of Ukraine, India, the Philippines and Georgia. PIP cooperates with the Border Guard under a 2018 agreement on joint inspections and training, as well as with the Police, the National Revenue Administration, labour offices and social insurance authorities. Since 1 June 2025, employers must inform foreign workers in writing, in a language they understand, of their rights, and fines for illegal employment have risen to PLN 3,000–50,000 per worker. Victim assistance is provided through the **National Intervention and Consulting Centre for Victims of**

Trafficking, operated by La Strada Foundation and Foundation “Dialog”. It offers a 24/7 helpline, crisis intervention, accommodation, and advice to public authorities.

Stakeholders’ viewpoint

From January to April 2026, EMBRACE **stakeholders’ consultation meetings** directly involving 380 participants were organised in **Greece**, **Italy**, **Bulgaria** and **Poland**. The following section presents the main insights from businesses, labour inspectors, public authorities, CSOs and other key stakeholders, alongside the voices of representatives of people with a migratory background and of groups vulnerable to labour trafficking and exploitation.

Greece

In Greece, the stakeholder consultations engaged **119 participants** across five dedicated sessions, each addressing a distinct constituency relevant to the prevention of labour exploitation and human trafficking. Migrant workers involved spanned diverse ethnic and migratory backgrounds and sectors of employment, including catering, domestic and elderly care, services, construction, cleaning, and tourism. Public authorities and regulatory bodies were represented by the Asylum Service, the Secretary General for Vulnerable Persons, a prosecutor at the Court of Appeals, the Office of the National Rapporteur on Combating Trafficking in Human Beings, a legal advisor to the Deputy Minister of Justice, a member of GRETA, the General Secretariat for Equality and Human Rights, the National Centre for Social Solidarity (EKKA), and the Public Security Directorate of the Hellenic Police. The private sector was represented by companies and SMEs, from senior executives to directors and managers responsible for ESG and sustainability, corporate social responsibility, compliance and ethics, internal audit, and human resources. The meetings also included civil society organisations (CSOs), non-profit organisations (NGOs) and associations, among them minority representative bodies such as the Ukrainian Women's Union.

Participants across all categories agreed that current efforts to address labour trafficking remain ineffective. **Labour inspectors** and front-line public-sector workers reported a significant increase in cases, concentrated mainly in agriculture and followed by forestry, fishing, tourism and hospitality, domestic work, and construction, with some cases in sectors such as fuel retail, laundries, and nightclubs. Labour inspectors see the **root cause of trafficking and exploitation** in poverty and the lack of decent living opportunities, followed by the presence of organised crime and, less frequently, limited labour inspections, an inadequate regulatory framework and weak cooperation with law enforcement. Other participants point to weak protection as a further risk, noting that the lack of legal migration routes continues to push many people into irregular channels, which can lead to forced labour. **Enforcement faces persistent operational and safety barriers**. Inspectors are hampered by inaccessible and remote work sites, limited mobility and are often exposed to threats, harassment, and physical violence. Identification is undermined by insufficient inspection mechanisms and by understaffed, under-resourced state services and police. Inspectors judged existing methodologies unsuited to the informal economy, found equipment and IT infrastructure insufficient, and reported that specialised training was largely absent. The efforts are further weakened by victims' fear of reporting and by weak whistleblowing channels.

Recruitment relies heavily on deception, exploiting vulnerable situations such as the absence of legal documents. Criminal networks recruit mainly through social media or personal contacts, promising high wages, housing, and legal work, sometimes misleading people who entered

Romania legally into believing they could also work legally in Greece, or portraying Greece as only a transit country. Once in place, however, the promised conditions rarely materialise. Victims are often kept in isolated accommodation such as warehouses, deprived of their documents, and left unaware of their rights, while misleading contracts, excessive hours, and minimal supervision remain common.

Representatives of CSOs observed a growing number of exploitation cases, occurring on a much larger scale, driven by evolving technologies, and embedded within informal labour markets, mostly in the fields of cleaning, agriculture, construction, and especially in food delivery. Exploitation most commonly manifests in unpaid or underpaid overtime, excessive working hours, unsafe or precarious working conditions, and undeclared or partially declared work, which deprives workers of social security and legal protections. Psychological abuse, intimidation, and coercion are also frequent but remain largely hidden or underreported, highlighting the challenges authorities face in detecting them. In some cases, exploiters reportedly seek to create an appearance of legality by applying for refugee status on behalf of the victim, providing them with legal documentation through the asylum process, at least temporarily, deflecting potential inspections and concealing the exploitative conditions. CSOs learn of labour trafficking and exploitation cases largely through inter-organisational channels. Cases surface mainly through exchange among professionals in working groups, coordination meetings, and other network interactions, complemented by hotline and institutional referrals from police, refugee camps, and other NGOs, and at times by personal narratives or news reports. This underlines how multi-stakeholder communication and cooperation are themselves a key mechanism for uncovering cases. Some participants pointed to a certain level of social tolerance for labour trafficking in Greece, attributed to the increasing demand for a low-cost workforce within the labour-intensive sectors.

Businesses perceive labour trafficking as a real issue that may lie hidden within their supply chains and subcontracting arrangements, acknowledging its direct and indirect impact on operational continuity, reputation, stakeholder trust, and long-term value creation. Even so, the systematic identification of suspicious practices remains limited and insufficiently reflected in corporate culture, policies, and procedures. The ability to detect red flags pointing to possible trafficking and exploitation in supply chains depends heavily on internal awareness, staff training, and clear guidance for employees. It also relies on structured monitoring and due diligence processes within individual companies, which are not always in place. Small and medium-sized enterprises in particular, which make up as much as 99% of companies in Greece, often lack the dedicated resources and organisational structures needed to address complex human rights risks and to contribute to preventing and combating trafficking. It is then understandable that many consider that the primary responsibility lies with the government.

Surprisingly little awareness of trafficking incidents was observed among participants representing **workers with a migratory background** within their own communities. A few participants described cases of labour trafficking occurring in countries of origin or in transit countries, where recruitment took place mainly through social media, and some mentioned exploitative practices in the domestic care and elderly care sectors, and in the tourism sector on the Greek islands. Limited proficiency in Greek, together with unfamiliarity with the country's legal, social, and cultural context, restricts workers' ability to communicate, to understand and navigate the labour market, and to assert their rights. The discussion highlighted a lack of access to essential information, along with the observation that many victims are unaware they are being exploited. On this point, migrant groups placed considerable responsibility on themselves,

and participants showed a strong interest in fostering greater inclusion and integration within Greek society. Participants stressed the need for migrants to stay cautious and to be well informed, arguing that investing in preventive information for migrants matters as much as tackling trafficking directly.

Cooperation between key actors is regarded as central to successful detection and prevention, yet obstacles persist. **Labour inspectors perceive collaboration as particularly weak with the Ministry of Health**, CSOs and employers' organisations, whereas cooperation is strongest with law enforcement and judicial authorities. Underreporting, the difficulty of distinguishing abusive labour conditions from trafficking, fraudulent recruitment, ghost companies and gaps in data interoperability (for example, between residence permits and ERGANI) further complicate enforcement.

Businesses still fear a regulatory burden and face complex, unclear expectations, which they attribute to weak state guidance and support in high-risk sectors. The detection and reporting of suspicious cases are hindered by low awareness of risks and rights, whistleblowing channels that are absent or little known, and underdeveloped grievance mechanisms and supply chain accountability. Organisational culture may not help either, as human rights tend to receive less corporate attention than environmental matters, and oversight remains fragmented.

Migrants and those supporting them describe a fragmented ecosystem where mechanisms exist, but victims cannot easily access them. Collaboration between stakeholders has improved over time, yet weak cooperation among health authorities continues to cause problems, and an **overreliance on CSOs** means they frequently carry out tasks that should fall to the state, disproportionately to their resources. The core barrier hindering the detection of trafficking and exploitation cases, according to this group of participants, is the accessibility of the support mechanisms and services available. For migrants and people in vulnerable situations, reporting is held back by many factors, including financial dependence, fear of retaliation, detention or deportation, low trust in authorities, and language barriers made worse by very limited interpretation. CSOs and NGOs themselves face funding and staffing constraints, difficulty reaching victims, inadequately trained state counterparts and, at times, threats. Participants emphasised that anonymous reporting mechanisms and clearer information on rights and protections would significantly improve migrants' ability to seek help.

Existing preventive and mitigation measures, as reported by **businesses**, rely on internal governance systems, whistleblowing channels, risk assessments, supply chain monitoring and ethical recruitment schemes such as IRIS (International Recruitment Integrity System). The consensus was that proactive approaches are more impactful than reactive ones and that dedicated training improves detection. Employer vetting, through initiatives such as the **Odyssey programme**, was cited as a way to address trafficking within companies, while raising migrants' own awareness was seen to reduce vulnerability.

CSOs pointed to **job integration programmes**, awareness campaigns, employer guides, company training and safe-migration messaging, alongside specialised, continuous training for police, social services and judicial authorities, which they considered one of the most crucial measures, together with greater public visibility. For **labour inspectors**, the main tools are the **ERGANI I and II information systems**, legal sanctions and practical manuals supporting the identification of trafficking. Sustained cooperation between public authorities, labour inspectors and police

emerged as particularly effective, especially risk-based inspections and joint actions: 415 inspections led to 124 fines.

CSOs, for their part, stressed the value of a **coherent national anti-trafficking strategy**, which sets clear priorities for tackling the problem, and called for more training courses for the Labour Inspectorate and other state actors. Across the groups, the common thread was that effective collaboration between CSO and the state, suggesting that regular expert-led training for frontline professionals is central to an effective joint response.

Italy

In Italy, the stakeholder consultation engaged **86 participants** representing a broad cross-section of actors in the Palermo territory. The private sector was represented by businesses spanning hospitality, tourism, food and beverage, agriculture, construction, property management, real estate, and consulting. Public authorities and regulatory bodies were represented by the Prefecture of Palermo, several municipal councillors, the Territorial Labour Inspectorate, municipal police forces from across Sicily, and the SAI reception and integration system. Participation also included CSOs, NGOs and associations, educational institutions, employers' associations and trade bodies, and the CGIL trade union. The consultation was further enriched by two in-depth interviews: with a business owner who employs female survivors of human trafficking, adding a practitioner-level perspective, and with a legal expert specialised in human rights.

For most **businesses**, human trafficking feels like a serious but rather distant issue. The term tends to evoke organised crime and victims moving illegally across borders, and, understandably, participants see themselves as ethical professionals committed to doing business properly, in whose working lives trafficking finds no counterpart. **Labour exploitation**, by contrast, is felt much more strongly as a present and close reality, something participants encounter in the everyday functioning of the local labour market and can speak about from direct experience. This is not a sign of indifference but a useful pointer to where the conversation can most naturally begin and where engagement with local businesses is likely to be most effective.

Various stakeholders confirmed the **presence of human trafficking in the territory**, noting that **victims mostly refuse to report their employer**, which may be a company or a private individual, as in the case of domestic and care workers. Vulnerability, however, is not limited to migrants. The **local population** is also affected, often through "fake" part-time or occasional contracts that mask full-time hours with lower pay and reduced protections such as social insurance, parental leave, and pension coverage. **Exploitation** is thus a concrete problem across multiple sectors and documented throughout the area, reaching vulnerable locals as well as migrants, though migrants without valid work or residence permits are the most exposed. For them, a genuine, stable contract is the gateway to a residence permit and therefore to housing, healthcare, mobility, education, and ordinary social life. This creates a vicious circle: insecure legal status deepens dependence on the employer, dependence discourages reporting, and abuse remains invisible to the system. Stakeholders working with migrant communities described a recurring version of this pattern, in which workers tolerate abuse and very low wages in the hope of eventually securing a permanent contract and, with it, the chance to settle in Italy legally and for good.

The discussion also touched on **regional and sectoral specifics**, confirming that the southern regions are particularly affected by *caporalato*, the illegal intermediation of labour in which unauthorised middlemen recruit and control seasonal agricultural workers, often imposing gruelling conditions and taking a cut of their wages. Puglia is the most affected region, though many cases have also been identified in Sicily. Further north, the **textile district of Prato** stands as a stark example of how exploitation can become the basis of competitive advantage: costs are contained through piecework pay, undeclared work, and deregulated hours, alongside the "sleeping agreement" system, in which the employer provides a bed inside the production units and meals, tying workers' lives entirely to the production chain. The workforce in this sector is mainly of Chinese origin. **Domestic and care work** raises equally serious concerns, since it takes place in private homes that lie beyond the reach of inspections. Here the workers are mainly migrant women, exposed to **heightened risk through isolation**, excessive hours, and potential abuse, a vulnerability deepened by Decree-Law 145/2024 (converted by Law 187/2024), which for the first twelve months confines foreign care workers to the sector for which they were hired and makes any change of employer conditional on authorisation from the territorial Labour Inspectorate, thereby discouraging reporting and reinforcing dependence. This was also confirmed by the legal expert interviewed. She sees the main obstacle, both for practitioners and for the authorities, as **intercepting the victims**. Those who reach the legal help desks usually learn of these services by word of mouth. People without such contacts, **isolated from both local society and their own community**, know neither their rights nor the available channels for support and reporting. At the same time, the authorities and operators are unaware of them and cannot offer information or assistance.

In **logistics** and **transport**, expansion driven by e-commerce has produced fragmented chains of subcontracts, often routed through bogus cooperatives or "open-and-close" companies and coupled with false self-employment for last-mile delivery; here the reports of the National Labour Inspectorate (INL, *Ispettorato Nazionale del Lavoro*) paint a particularly alarming picture, with fewer than 20% of inspected companies found free of irregularities.
Different barriers to preventing and combating THB and labour exploitation emerged from the discussion. Firstly, the **complexity of the legal and administrative framework** governing both migration and work traps migrant workers in a legal “limbo” that unscrupulous employers or intermediaries can exploit. The **labour law expert** pointed to a **tension in the Italian system,** where labour inspectors must report any offence they encounter, including a migrant's irregular status, which can expose the very victims they are meant to protect to expulsion and thus discourages reporting. Some argue this duty could be read in harmony with ILO Convention No. 81 to prioritise worker protection, but this remains an interpretation rather than settled law. Decree-Law 145/2024 sought to ease the problem through a dual-track protection system, yet with limits as the new Article 18-ter permit for labour-exploitation victims follows **a reward-based logic**, since it cannot be requested by the worker and depends on their "useful" cooperation with investigations, while the more protective social pathway under Article 18 *(permesso di soggiorno per motivi di protezione sociale)*, which does not require cooperation, is in practice applied more readily to victims of sexual trafficking and only very rarely to those of labour exploitation. The reform was seen as a missed opportunity to correct these distortions.

The **most significant gap identified in the legal landscape is the dysfunction of the *decreti flussi***. This is the mechanism through which Italy regulates the legal entry of non-EU workers. It sets annual quotas for work-related entry and provides a regular channel for workers to reach the country, with the employment tied to a specific company and the application handled

entirely online. In the countries of origin (such as Bangladesh and Sri Lanka), **intermediaries** often exploit prospective candidates, demanding an illicit fee not foreseen by the decree and promising to secure them a job in Italy. Frequently, on arrival, the worker finds that the employer no longer exists, sometimes for ordinary reasons, such as a job offer that has lapsed after a long procedure or a company that has since closed, and sometimes because the company was never genuine and the job never real. In these cases, the worker cannot register the residence contract, complete the procedure, or obtain a residence permit, and falls into irregularity. The legal remedies are unclear. In theory, the person is entitled to a permit pending re-employment, but in practice this is seldom granted. The alternative, international protection, requires proof of trafficking and follows a long, retraumatising procedure. With no clear or consistent guidance, lawyers often proceed by trial and error: they attempt one route, appeal, then try another. **The most urgent legal priority** is therefore to **revise the *decreti flussi*.** Though designed as a regular, legal channel, it conceals numerous loopholes and openings for exploitation: intermediaries enriching themselves through unlawful fees, non-genuine employers and jobs, and procedures so slow that they prevent any real match between labour supply and demand. In support of this, the legal expert cited the analysis by the Ero Straniero campaign confirming the decree's ineffectiveness: only 7.9% of residence permits were requested in 2025, meaning roughly 8 in 100 foreign workers had completed the procedure by December 2025. The human impact is serious: a person who enters through a State-created legal channel yet cannot complete the procedure ends up undocumented, without work, and exposed to the very vulnerability and risk of exploitation the system was meant to prevent. The **absence of coordinated institutional support for regularisation** was also mentioned by some employers who shared their first-hand experience of stepping in to help an employee regularise their status. Drawing on the advantages of being local, such as familiarity with the language, the institutions, and the administrative system, they navigated the procedures on the worker's behalf, at times successfully. These accounts document meaningful acts of solidarity that, however, cannot substitute for a functioning system.

Another **barrier** that emerged is **cultural**. Reluctance to report abuse or exploitation remains widespread, driven by fear of retaliation, distrust that reporting will help, or resignation. Participants drew a parallel with attitudes that were more common in the past, when certain forms of illegality tended to be tolerated as part of the local context, framing the acceptance or rejection of illegality as an ethical choice each person makes. The discussion converged on a shared point that fair pay, proper contracts, and safe working conditions should be seen as the normal baseline of doing business, where lawful working conditions are the ordinary foundation of legitimate business, not as a sign of exceptional ethics.

A complex set of **barriers** relates specifically to the **workplace integration** of migrants and trafficking survivors, based mainly on the accounts of an employer with long experience in providing job opportunities to female survivors of human trafficking. Many people, especially women, arrive with little formal education and must navigate a new cultural setting, a new language, and unfamiliar professional standards, often while managing a complex family situation, such as being the sole carer for their children, making them extremely vulnerable to THB and labour exploitation even after reaching their destination country. The employer's experience makes clear that, even for honest employers, circumstances of this kind call for real investment, including on-the-job training as well as a degree of flexibility, such as time off for schooling, appointments with the authorities, and caring responsibilities. These are significant challenges that no single employer can be expected to address alone. Meeting them calls for

coordinated collaboration among businesses, social and mental health services, cultural mediators, and educational institutions, with public institutions offering active guidance and support. At present, this kind of support network, one that would assist both migrants and employers in work integration, is not yet fully in place. As a result, much of the effort continues to rest on the willingness and commitment of individuals. This finding is critical, since stable and dignified employment is one of the strongest protective factors against both initial victimisation and re-victimisation. When **integration fails**, migrants and even survivors can fall back into the economic vulnerability and dependence that traffickers and exploitative employers rely on.

On the other hand, several **resources and good practices** were identified. The interviewed employer's model stood out as a concrete example of good practice of a prosperous business built on social responsibility principles, actively contributing to the reintegration of victims of THB and awareness-raising in both local and migrant communities. By directly employing women from vulnerable and migrant backgrounds, often survivors of trafficking and violence, she demonstrates that an approach combining regular working conditions, flexibility, and dedicated training can have a positive impact on both levels at once. The individuals benefit from stable employment, allowing personal autonomy and dignity, while the company benefits from motivated employees and a sound, ethically grounded business model and positive reputation.

Other supporting services were identified as efficient in the territory. The **labour union CGIL** offers widely accessible free legal consultations to both migrants and companies on contracts; ***Clinica Legale Migrazioni e Diritti*** (Legal Clinic) at the University of Palermo offers free legal help for migrants, run by law students with teachers and lawyers, focusing on international protection, legal status, and basic rights; while the ***Dipartimento Migranti*** provides advisory support on regularisation pathways. Trade unions, in general, serve as ground-level "sentinels", collecting reports from workers who distrust the authorities and supporting victims in asserting their rights and re-entering lawful employment. Suspected victims of trafficking in Palermo are often referred to the **Progetto Maddalena**, an anti-trafficking initiative run by the association Casa dei Giovani, which provides a mobile street unit, a listening centre, and reception services for women victims of exploitation.

Additionally, labour inspectors and enforcement authorities highlighted a positive development is the introduction of **Simel**, a digital platform developed by the City of Palermo that allows authorities to verify a business's administrative position in real time by scanning a unique QR code displayed at the premises. Officers can check the type of activity, the authorisations and permits issued, and the full history of administrative procedures and previous inspections. The tool is designed to simplify checks and concentrate inspection efforts on unlicensed and irregular operations, while reducing bureaucracy for fully compliant businesses and increasing administrative transparency.

Finally, stakeholders agreed that the EMBRACE project offers a valuable opportunity to launch a new **multi-stakeholder platform**, bringing together willing enterprises, public institutions, and civil society around a shared emphasis on ethical employment, responsible business conduct, and greater awareness of human trafficking in the labour market. Participants stressed that synergy and concrete results matter more than dialogue alone, and that leadership from public institutions with real regulatory authority is decisive. A final forward-looking idea that emerged from the consultations was to actively **open local SME associations to migrant-owned businesses**, which currently operate within closed communities, as a route to greater

transparency and to the prevention of exploitative working practices and forced labour linked to human trafficking for labour exploitation.

In Bulgaria, the stakeholder consultation engaged **94 participants** across eleven smaller meetings, bringing together a wide range of perspectives. Participants included public institutions, national social partners such as trade unions and employer associations, businesses mainly from the hospitality sector, non-governmental organisations, legal and academic experts, and displaced persons sharing their first-hand experience, comprising 19 refugees and asylum seekers from the Middle East and 7 women under temporary protection. The consultation also involved two international actors, a UK Embassy migration officer and a Bulgarian member of GRETA. Public institutions were represented at a senior level, including the Ministry of the Interior (Border Police, Migration Directorate, and the anti-trafficking sector of the General Directorate for Combating Organised Crime), the Ministry of Labour and Social Policy, the General Labour Inspectorate, the Employment Agency, the National Statistical Institute, and the Local Commissions for Combating Trafficking in Human Beings.

Consistently, participants from all groups perceived labour exploitation and trafficking for labour exploitation as a serious phenomenon that often remains hidden behind formally lawful employment relationships, administrative procedures, and intermediary practices. In their view, the problem lies not only in severe cases but also in the gradual accumulation of smaller violations and dependencies that lead to vulnerability, creating a gap between the official statistics and the reality experienced on the ground. Indeed, civil society organisations, trade unions, some businesses, and migrants themselves describe **widespread concealed exploitation**, manifested in work without contracts, mismatched expectations regarding the duration and conditions of employment, wages lower than agreed, excessive hours, retention of documents, inability to change employer, intermediary fees, unsatisfactory living conditions, and dependence on informal recruiters. Particular concern was raised about contracts used primarily to secure residence or work permits, with the actual conditions altered once the worker arrives. Alarmingly, some participants noted that affected individuals often perceive such practices as normal or unavoidable, rather than as indicators of serious violations. **Participants with a migratory background** reported limited awareness of their rights, and mentioned that many migrants do not see themselves as victims of a crime, since their circumstances still compare favourably with what they left behind or endured along the migration route. At the same time, they are not well informed about the support mechanisms available. Fear of losing their job and legal status, threat of deportation, or retaliation prevents them from reporting exploitation, and this silence risks being misinterpreted as an absence of cases. Together, these factors form a major barrier to prevention and deepen vulnerability. Moreover, many migrants rely on informal community networks, including social media groups, as their primary source of information about work, conditions, and rights, which is all the more dangerous given that fraudulent recruitment and exploitative intermediaries often operate from within those same communities. This reliance is not confined to the most disadvantaged; even higher-educated migrants who face fewer language barriers, as reported by participants of Ukrainian origin, may remain reluctant to approach local institutions, preferring individual consultations and community-based support.

Language barriers emerged as an almost universal barrier factor, though their intensity varies. For participants of Middle Eastern origin, language is the main obstacle to understanding their rights and options. The point that stands out is that information should not merely exist but be

accessible, trusted, and practically usable for all. Groups across the meetings called for materials in relevant languages, clearer visibility of helplines and complaint channels, more accessible language courses, and guidance on arrival or even before departure, disseminated through institutional and embassy websites as well as the closed online communities where people can turn for help. Stakeholders stress that the first three months after arrival are decisive, shaping a sense of security and belonging and determining the likelihood of remaining in legal, stable employment. Without support at this stage, the risk of drifting into informal work or into dependency on intermediaries and community networks rises significantly.
Particular emphasis was placed on **unaccompanied young people**. On turning 18, some fall into a legal and social vacuum, without documents, employment, or stable support, and turn to informal work through their own communities. Integration efforts made between 16 and 18 are thus interrupted precisely when the risk of exploitation sharply increases.

From the stakeholders' discussions emerged a cluster of **interconnected challenges**, from an **unclear conceptual and regulatory framework**, limited institutional capacity, low trust in authorities, the significant role of intermediaries, language and integration barriers, and uneven vulnerability across migrant and refugee groups. The most consistently raised difficulty was the lack of a clear distinction between labour rights violations, labour exploitation, and trafficking for the purpose of labour exploitation. **Institutional and NGO representatives** noted that this ambiguity, compounded by the difficulty of proving psychological coercion, often leads to serious cases being treated as ordinary breaches of labour law. The boundary between poor working conditions and exploitation is hard to recognise and is interpreted inconsistently, which in turn affects the institutional response and the prospects for accountability. The practical consequence is that formal legality can mask the reality.

Intermediaries emerged across all stakeholder groups as a central critical element in labour migration. Employers in particular acknowledged that recruitment from third countries would be extremely difficult without intermediary agencies. At the same time, this is where risks concentrate, including misleading information, recruitment fees, document manipulation, and a lack of transparency about the actual conditions of employment. Businesses rely heavily on the integrity of intermediaries, selecting agencies that claim to apply transparent procedures. Some employers reinforce this with their own safeguards, including pre-arrival online interviews explaining working and living conditions, and subsequent oversight to verify that these are respected in practice. An important structural imbalance in intermediary regulations in Bulgaria was pointed out by some participants. The state maintains a public register of licensed intermediaries for citizens seeking work abroad, but no equivalent system exists for those facilitating incoming labour migration.

Seasonal employment was also described as a high-risk area, marked by strong demand for low-skilled workers and an increased likelihood of discrepancies between formal and actual working conditions. Seasonal foreign workforce is essential for some businesses, yet simplified procedures and short-term contracts can produce a continuous flow of workers who do not fully grasp the conditions of their stay, who remain after their contract expires, or who drift into informal work after leaving their initial employer. Labour migration may thus function as a transit mechanism rather than solely as a response to labour market shortages.

Stakeholders acknowledged that **cooperation among public authorities** has improved in recent years, though it remains unstable and inconsistent, held back by limited staff capacity, heavy

workloads, and insufficient specialised training. With key legislation currently under revision, participants called for a more comprehensive and integrated approach to reform, particularly concerning third-country nationals. Aligning the different legal acts would ensure coherent improvements in access to rights, and above all, in the effective identification and support of trafficking victims among this group. Coordination between public authorities and the private sector could also be improved. Stakeholders noted that the mandates and competences of the different institutions are not always sufficiently clear to employers, while business representatives are not consistently involved in consultations on legislative or regulatory developments. Existing measures remain fragmented and unevenly implemented.

Stakeholders called for **stronger regulation and monitoring of intermediaries**, due diligence in supply chains, accessible complaint mechanisms, fewer administrative barriers, better access to legal aid and compensation, and the possibility for workers to change employers without losing their legal status, alongside stronger labour inspections, greater institutional capacity, and better data collection. Practical guidance is equally needed. Clear criteria to distinguish labour law violations from exploitation and trafficking, and checklists helping frontline staff recognise indicators such as debt, document retention, and coercion. Training should reach public authorities, businesses, and civil society alike, supported by joint inspection teams and by assistance offered proactively at points of entry and during the first months after arrival, rather than only once problems surface. Prevention should begin earlier still, through **cultural and community mediators** in countries of origin and structured pre-departure sessions on rights, working conditions, and available support, with particular attention to unaccompanied young people. Employers, for their part, should work only with verified intermediaries, explain employment conditions in a language workers understand, and provide guidance and monitoring after arrival.

Besides the challenges and critical points, stakeholders pointed to various **promising practices** for strengthening prevention and response. Institutions rely on inter-agency cooperation, information campaigns, and screening. Concrete examples include the **"Solidarity" programme**, information materials at points of entry and within migration services, bilateral memoranda with Moldova and Israel, airport screening, and verified platforms such as migrantlife.bg. Civil society contributes outreach, legal assistance, language training, and awareness campaigns in migrants' own languages, along with cultural mediators who help build trust and bridge the gap between institutions and migrant communities. Businesses described internal safeguards such as structured recruitment, verified intermediaries, pre-arrival interviews, translated work instructions, and clauses in collective agreements.

Also, migrants involved in the stakeholders' meetings showed constructive attitudes. Many prefer to work for Bulgarian employers rather than within closed community networks, seeing this as a route to better integration and less dependency. They also welcomed the on-site meetings held by the NCCTHB and the BFBHR, valuing the fact that institutions come to them directly to understand their needs.

In Poland, the stakeholder consultation engaged **81 participants** across six group meetings and nine individual consultations. The Polish consultations combined institutional authority, strong enforcement participation through police, border guard, labour inspectors, and input from the private sector, trade unions, and academia. A notable feature of the Polish consultation was the direct participation of **survivors of forced labour**, six women and five men, all of Colombian and Venezuelan origin. State administration was strongly represented, with officials from the



Ministry of Funds and Regional Policy, the Ministry of Family, Labour and Social Policy, and the Ministry of the Interior and Administration, together with the Office for Foreigners, the Department for Combating Trafficking in Human Beings of the National Police Headquarters, and the Border Guard Headquarters.

Representatives of **state administration** provided an insight into the system at the level of data and process, pointing to statistical fragmentation due to the absence of an integrated system across key institutions: police, Border Guard (*Straż Graniczna*), Ministry of Administration and Internal Affairs *(Ministerstwo Spraw Wewnętrznych i Administracji, MSWiA)*, National Intervention and Consultation Centre for Victims of Human Trafficking *(Krajowe Centrum Interwencyjno-Konsultacyjne dla Ofiar Handlu Ludźmi, KCIK)*, and the Central Statistical Office *(Główny Urząd Statystyczny, GUS)*. They also identified a processing gap, which creates a structural incentive to rely on intermediaries, explaining that an employer's declaration can be registered in seven days, while a work permit takes at least a month and often several. Officials explained that the **National Referral Mechanism** is in practice only a guidance document rather than an administrative procedure, with no binding decision timeline and no right of appeal. They introduced the concept of "functional incompetence", where procedures so complex and slow that victims simply give up produce the same result as deliberate obstruction, while generating no record and no accountability. They also described the voluntary-return paradox, where the same institution manages both victim protection and deportation, as a structural violation of victims' rights in practice.

Labour inspectors pointed to a gap between detection and enforcement. They routinely encounter indicators of forced labour that cannot be easily verified, such as wages that do not match hours, cash payments, sham civil-law contracts, and permits structured to guarantee undeclared work, yet at almost every step, the legal and practical framework prevents them from turning what they observe into protection or sanction. Cash and side contracts sit outside their supervision, agency coordinators physically block access to workers, interpretation is unavailable, and victims stay silent for fear of deportation. Specifically, workers from Latin America reportedly treat any contact with a state official as a threat to their stay. In one case, around fifteen Colombian workers agreed to meet an inspector, and not one appeared. During inspections of agency-staffed sites, access is a further practical obstacle. Coordinators may block access, and without police or Border Guard support, inspectors cannot force their way in, giving workers the chance to slip away. Language barrier compounds the difficulty, as sworn interpreter lists are short, some languages have no interpreter in Poland at all, and the law does not clearly authorise AI-assisted translation, which inspectors avoid because anything not expressly permitted is treated as forbidden. Finally, they noted that the Ministry's withdrawal of a favourable legal interpretation (Art. 84(1) of the Act on Conditions of Permissibility, orig. *Ustawa o warunkach dopuszczalności powierzania pracy cudzoziemcom na terytorium Rzeczypospolitej Polskiej)* under which a user company that was shown to be operating disguised temporary work agency activity faced a 6,000 PLN fine per person. Without this interpretation, inspectors have significantly reduced tools against unlawful outsourcing arrangements.

Survivors of forced labour (Colombian and Venezuelan women and men) described the mechanics of exploitation from the inside. They pointed to recruitment chains so long and layered, running from the country of origin through a transit country to Poland, that victims cannot tell who is actually responsible, and agencies constantly change their legal form to shed accountability. They described deceptive recruitment, including agencies posing as religious

orders or NGOs and having migrants sign volunteer agreements instead of employment contracts. Above all, they identified debt as the main instrument of control, through inflated recruitment costs, sometimes notarised back home, and deliberately set so high that they can never be repaid at the wages actually earned. They also explained that victims do not recognise themselves as such and have little relevant information accessible in their own language. Fear of the police, actively encouraged by the agencies and reinforced by experience of corruption at home, combines with social isolation and shame to make help-seeking almost impossible without outside support. Above all, they described fear of deportation as the barrier that overrides all others. Because labour protection and immigration enforcement are not separated, any contact with an official body, including the Labour Inspectorate, becomes a deportation risk. They also reported that the Border Guard lets people through without acting on clear warning signs, and pointed to some informal ties between the recruitment agencies and individual border officers, often at points of entry in Spain, the Netherlands, or Germany rather than Poland itself. They also stressed that some client companies can see the poor working conditions in real time, yet do nothing.

Business representatives, on the other hand, brought to the attention structural blind spots within companies. They explained that HR is legally barred from monitoring outsourced workers for fear of creating a co-employment relationship, leaving oversight to procurement teams with no human rights expertise, so no internal actor owns the problem. They highlighted that residence permits tied to a single employer make loss of a job an automatic loss of legal status, which silences complaints, and that migrant workers arrive wholly dependent on intermediaries for housing, banking, and basic navigation. They reported that forced labour is simply absent from most companies' agendas, with board-level responses amounting to "we don't violate human rights", so that even where individual ESG (Environmental, Social, and Governance) staff understand the issue, the organisation does not. They pointed to the lack of any joint-liability framework, making user-employers responsible for wages when an agency collapses, and to newer risk layers largely beyond control, including outsourced logistics services that are even more opaque than agency work, and platform and gig-economy models admitted into employer federations without scrutiny. They also flagged the difficulty of verifying risk in long, multi-country recruitment chains, and the "local dominance" problem, where a single large employer in a small town effectively controls local administration and inspection priorities, making violations invisible by design.

Civil society organisations focused on the legal and procedural weaknesses of the system. They noted that the 2010 criminal definition of trafficking requires too many criteria to be met at once, so very few cases are ever prosecuted, and that the absence of a single anti-trafficking act leaves responsibilities scattered across many laws. A critical point, echoed by many participants, was that the labour inspectorate's duty to report undocumented workers turns a body meant to protect them into an instrument of deportation. They also described lengthy residence legalisation procedures, sometimes lasting more than two years, that keep victims economically dependent on the agency or push them into informal work, along with a procedural paradox whereby a certified presumed victim who files a residence application can no longer access voluntary return programmes. Using immigration status as blackmail, though a common tool of control, is not a distinct offence under Polish law. They further pointed to a loss of coordination, since the Ministry conference that once served as the main multi-stakeholder forum is no longer held, and no equivalent space exists. Additionally, they warned of a newer trend in which agencies disguise themselves as charities, cultural associations, or religious organisations, even

copying the logos of legitimate bodies such as the Latin American Trade Union. They cautioned, too, that the visibility of the Latin American community reflects its advocacy capacity rather than a higher prevalence, while Asian, African, and Ukrainian workers may face worse conditions in silence.

Other participants from NGOs and businesses highlighted the **structural and legislative gaps** in the Polish system. They argued that the employment-agency market is inadequately supervised, with a large informal sector operating with effective immunity and penalties too low to deter. Subcontracting chains are a particular concern, since they run so deep that liability cannot be established. It is for this reason that trade unions recommend capping them at three to four levels. They identified specific legal gaps that create forced-labour risk, including the "farmer's helper" category excluded from the minimum wage, permits tied to a single employer so that job loss means immediate illegality, widespread fictitious self-employment, and legalisation processes often exceeding 700 days. Forced labour, they added, is often undercounted and misclassified, with cases redirected to labour courts as minor violations and kept outside the anti-trafficking system. Their overarching concern was deregulation and the absence of systemic policy. Since the response rests on strategy documents rather than primary legislation, there is still no legal definition of forced labour in Polish criminal law, and the state has remained largely unresponsive to repeated calls from civil society and trade unions. Their shared conclusion was that the **National Labour Inspection lacks the staffing, budget, mandate, and methodology** to identify forced labour, and that without strengthening and professionalising it, no other measure can produce real change.

Stakeholders consulted in Poland identified various **opportunities and good practices** worth noting and building on. Survivors mentioned La Strada and Nomada as the most helpful NGOs, identifying Border Guard or police intervention with court orders, coordinated in real time with La Strada and independent of local police, as the most effective rescue model. To encourage reporting, they advocate for individual rather than group interviews, independent grievance channels, interpretation, and full transparency about the real cost of their labour. Participants from Latin America also stressed that prevention should be promoted by providing verified Spanish-language information through Polish embassy channels, reaching people before they leave their country of origin. CSOs emphasised migrant self-organisation, notably the Latin American Trade Union (100+ members, affiliated to the largest Polish trade union OPZZ - *Ogólnopolskie Porozumienie Związków Zawodowych*), which holds real-time knowledge of agency operations that no inspection can reach. Trade unions were also seen as an untapped identification asset whose formal inclusion in the National Referral Mechanism would extend reach at no new cost, and to standardised contract clauses providing for termination on serious violations and direct payment of wages to agency workers. State administration brought forward emerging structures and transferable models, such as a 2025 training for Latin American consular staff in Warsaw, the new inter-ministerial committee (first convened March 2026) as the most viable coordination platform, structured worker questionnaires as liability-excluding due diligence on the Lithuanian model, the local integration example of Prusice, and the UK National Referral Mechanism as directly transferable.

Labour inspectors pointed out the good practice of the Dutch and Scandinavian **joint-liability model** as the single most impactful reform, since it collapses multi-tier subcontracting into a verifiable bilateral relationship. They paired it with two quick wins, mandatory wage payment by

bank transfer and a minimum monthly wage floor as a permit condition, plus personal sanctions and permit disqualification for firms that rebrand to continue operating.

Business representatives focused on **market leverage**, citing Polish competition and consumer authority (UOKiK) enforcement and the Consumer Empowerment Directive as financial risks that boards understand, peer-to-peer audit sharing already practised in the food sector, and large infrastructure projects as an entry point for embedding due diligence. A significant point is that companies can act immediately by verifying workers' legalisation and insurance status, disclosing agency margins, and extending whistleblower systems to agency-placed workers.

The **stakeholders'** proposals converge on two **main** priorities**. Firstly,** joint liability to dismantle subcontracting chains, and prevention at source before workers leave their country of origin. The Omnibus package has significantly narrowed the scope of the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD), removing the main compliance argument that companies had been relying on, namely the expectation that binding EU rules were coming. As a result, the market-based levers described above, enforcement by the Polish competition and consumer authority (UOKiK), the consumer-protection directives, and the incoming EU Forced Labour Regulation must now replace a driver that has just weakened.

SWOT

Strengths

All four partner countries recognise trafficking in human beings (THB) as a **serious human-rights violation**. The national anti-trafficking policy and legal framework are viewed as a cross-sectoral governance concern that encompasses criminal justice, labour, migration, social protection, and business regulation. Greece, Italy, Bulgaria, and Poland all adopt a structurally aligned, multi-agency, victim-centred approach to combat human trafficking. This strategy is based on EU and international standards (EU Directive 2011/36/EU, Council of Europe Convention, Palermo Protocol) and is facilitated by institutional coordination mechanisms. All countries also have formal or operational National Referral Mechanisms (NRMs) or equivalent coordination systems. Moreover, EU Member States are involved in the European Multidisciplinary Platform Against Criminal Threats "EMPACT", a security initiative implemented in cooperation with EUROPOL and the European Labour Authority to fight organised international crime.

Greece

- **Strong and aligned legal framework**
    - Greece's legal framework on trafficking in human beings is robust and aligned with EU and international standards.
    - Recent reforms, notably Law 5038/2023 and amendments to the Criminal Code, demonstrate a strong governmental commitment to combating trafficking and labour exploitation.
    - Legislative developments have been positively assessed by GRETA, particularly regarding full criminalisation of THB and enhanced protection for migrant and vulnerable workers.
- **Comprehensive, multi-agency institutional approach**

    - Greece applies a multi-sectoral and interdisciplinary model, involving 11 public authorities (including the Ministry of Labour, Labour Inspectorate and Hellenic Police) and a broad network of 59 NGOs and international organisations.
    - This cooperation supports coordinated detection, investigation, victim protection and service provision, enabling comprehensive responses across sectors.
    - Inter-organisational learning as a detection mechanism: CSOs succeed in uncovering cases through working groups, coordination meetings, and network exchange, framing multi-stakeholder cooperation itself as a key detection asset.
    - Based on the stakeholders' account (EMBRACE meetings, 2026), inspections and joint actions were particularly effective, with a concrete figure (415 inspections leading to 124 fines).
- **Systems and programmes in place**
    - The Odyssey Program, a labour integration program that evaluates different employers and promotes safe, transparent recruitment for migrants and asylum seekers. It conducts workplace appointments to assess conditions and applies a prevention-focused approach.
    - IRIS (International Recruitment Integrity System) sets a global benchmark, the IRIS Standard, defining what fair and lawful recruitment of migrant workers means in practice, and runs a voluntary certification scheme with third-party audits and a compliance and monitoring mechanism for private recruitment agencies.
    - ERGANI - the Greek Ministry of Labour's electronic information system through which employers must declare all employment events (hiring, working hours, overtime, termination) for every worker, giving labour inspectors a real-time data source for cross-checking and targeting inspections, and improving transparency across the employment lifecycle.
- **Effective coordination and referral mechanisms**
    - The National Referral Mechanism (NRM) and the Office of the National Rapporteur (ONR) play central roles in coordination, victim identification and protection.
    - The NRM provides standardised procedures, operational guidance and coordination among stakeholders, strengthening consistency in responses.
- **Accessible victim support and protection services**
    - The 1109 National Human Trafficking Hotline operates nationwide on a 24/7 basis, offering confidential, multilingual support, referrals and emergency assistance.
    - Specialised organisations provide targeted support, including assistance to child victims, survivor care, medical services and social reintegration.
- **Strong prevention and awareness initiatives**
    - Greece implements successful awareness campaigns and projects, such as Break the Chain and PROCAP, focusing on prevention, victim protection, capacity building and stakeholder cooperation.
    - Public awareness initiatives reinforce early detection and reduce vulnerability to trafficking.
- **Capacity building and evidence-based policy**
    - Continuous training of frontline professionals is provided through the NRM, supported by handbooks, toolkits and standard operating procedures.

- A modern data collection system within the NRM produces biannual analytical reports, enabling evidence-based policymaking, monitoring and evaluation.

Italy

- **Robust and comprehensive legal framework** against trafficking, exploitation, and *caporalato*, strengthened by multiple national laws (Legislative Decree 286/1998, Law 228/2003, Law 146/2006, Law 108/2010, Legislative Decree 24/2014, Law 199/2016, Law 47/2017, Law 173/2020, Law 187/2024, Legislative Decree 115/2026) and aligned with key international instruments (Palermo Convention, Council of Europe Trafficking Convention, EU Directive 2011/36/EU).
- **Solid victim-protection mechanisms**, including:
  - Special residence permits for exploited workers (Art. 18 & 18-ter TUI; Law 187/2024).
  - Social protection pathways independent of cooperation with authorities.
  - Assistance, compensation, and protection for minors (Legislative Decree 24/2014).
- **Integrated national support system**, such as:
  - The **National Anti-Trafficking Helpline (24/7)**.
  - Programme for identification, assistance, and social integration of victims, with somewhat increasing funding and nationwide NGO-institution partnerships.
- **Established multi-level governance**, involving:
  - National Referral Mechanism, National Steering Committee (*Tavolo Caporalato*, under the Ministry of Labour and Social Policies) and Technical Committee for planning, implementing.
  - Regional inter-institutional roundtables ensuring territorial coordination.
- **Comprehensive national strategies and plans**, including:
  - Two National Anti-Trafficking Action Plans (2016–2018; 2022–2025).
  - National Plan against Labour Exploitation in Agriculture (2020–2022).
  - National Plan against Sexual Abuse and Exploitation of Minors (2022–2023).
  - Plan to Combat Undeclared Work (2023–2025).
- **Strong investigation and prosecution capabilities**, with trafficking cases handled by **26 District Anti-Mafia Directorates (DDAs)**.
- **Enhanced data collection and monitoring**, supported by the **SIRIT national information system**.
- **Active engagement of civil society and private sector**, including awareness-raising campaigns (e.g., Confesercenti Sicilia) and regional initiatives like the **Su.Pr.Eme.2** programme (ESF+ funded), providing integrated support to victims of labour exploitation and *caporalato* in five Southern Italian regions, from training and job placement to housing and health services.
- The **consultation and advocacy** offer, e.g. CGIL free legal consultations and the *Dipartimento Migranti advisory* support.
- **EU-funded projects** implemented at the national level that address trafficking through a comprehensive, multi-level approach integrating prevention, victim protection, and professional capacity-building, such as ASIT, SAFE HUT, HOST, Safe Borders.

Bulgaria

- **Comprehensive legal and institutional framework**
  - Anti-trafficking laws, NCCTHB, specialised police, labour inspectorates.
- **Strong civil society and international presence**



    - NGOs, IOM, and UNHCR provide services, training, and innovation.
- Increasing state recognition of labour trafficking in official statistics and policies.
- Growing **public awareness** through campaigns targeting seasonal workers.
- **Regulated labour migration channels** that, if strengthened, can reduce irregularity.
- **International commitments** that align Bulgaria with EU standards.
- Leveraging **business influence and leadership** of good recruitment practices.
- Concrete examples, such as the "Solidarity" programme, bilateral memoranda with Moldova and Israel, and verified platforms like migrantlife.bg, are described in the Bulgaria stakeholder section. Civil society complements them with outreach, legal assistance, language training and cultural mediation.
- The NCCTHB and BFBHR **on-site outreach model**, which migrants specifically valued for building trust.
- Businesses' own **internal safeguards** (structured recruitment, verified intermediaries, pre-arrival interviews, translated instructions, clauses in collective agreements).

Poland

- **Evolving legal and policy framework**
    - **Labour Market and Employment Services Act** (2025), strengthening safeguards for foreign workers, targets exploitative practices, and raises standards for employment agencies.
    - **National migration strategy** (2025–2030), providing an overarching, long-term policy framework, which foresees concrete integration instruments, including **Centra Integracji Cudzoziemców (Foreigners' Integration Centres)** to support legally resident foreigners.
    - **Legal definition of employment relationship** bans civil-law contracts where work is genuinely dependent, countering bogus self-employment.
    - **Whistleblower channels** have a legal basis by adopting the Whistleblower Directive (2019/1937) through a National Act in 2024, making internal reporting channels a legal obligation for larger employers.
- **Strategic anti-trafficking architecture**
    - **Legally grounded National Referral Mechanism (NRM) is** legally grounded, EU-aligned and built for multi-stakeholder cooperation.
    - **National Action Plan against Human Trafficking (2025–2027)**, defining priorities, responsibilities, and measures across institutions.
    - **Potential for proactive coordination:** NRM and NAP provide ready-made tools to strengthen coordination between State institutions, NGOs, businesses, and trade unions.
- **Institutional coordination and governance mechanisms**
    - Inter-ministerial committee (2018-2022) to counter trafficking formally established and mandated to support coordination, monitoring, and implementation of anti-trafficking measures, offering a platform to bridge gaps between legal acts and institutional mandates**.**
    - **Committee on the Support for the Sustainable Development of Companies,** PM decree December 2025.
    - **Institutional memory and cooperation culture**, establishing a long-standing collaboration between NGOs and state institutions through working groups.
- **Enforcement capacity and frontline cooperation**

    - Effective enforcement institutions with clear mandates, including the National Labour Inspectorate (PIP), specialised police units, and other competent bodies. Extensive inspections regularly uncover irregular employment involving foreigners.
    - Planned amendments strengthening labour inspection powers, proposing changes to the Act on the National Labour Inspectorate, would empower inspectors to reclassify civil-law (including B2B) contracts into employment contracts and enhance enforcement against disguised employment.
    - **High inspection activity combined with strong enforcement tools**, including: Stop-work orders, removal of workers from danger, shutdown of unsafe machinery, written orders and fines.
    - Inspector insight: Educating user companies before inspection outperforms enforcement alone (firms respond to reputational risk); some provincial offices refuse permits to disguised outsourcers (model practice).
- **Operational cooperation and frontline practice**
    - Effective inter-agency cooperation: regular joint inspections and information exchange between PIP, Border Guard, Police, Customs and Tax Administration (KAS), Labour offices, social services, ZUS, and others.
    - Active awareness-raising and prevention activities conducted by public services and NGOs, targeting migrants and other groups at heightened risk of exploitation. Concrete good practices represented by La Strada and the Border Guard offer effective collaboration and assistance to the vulnerable and exposed population.
- **Business accountability and recruitment oversight**
    - Framework: OECD National Contact Point; CSRD transposition; subcontracting-chain liability for general contractors; agency oversight via KRAZ registration and record-keeping.
    - Stakeholders' insight: 2020 Handbook on Forced Labour used directly by companies to build internal procedures; durable internal mechanisms in some firms (sensitive-industry policies, decade-long agency partnerships with human-rights clauses, dual whistleblowing channels, staff training).
    - Forced Labour Guide: How to Recognise It and Counter It (*Praca przymusowa. Poradnik: jak ją rozpoznać i przeciwdziałać* (Faracik, 2020)) developed by the Working Group on Relations with Persons Performing Work offers a complex set of practical tools for companies to prevent, detect and manage the risk of forced labour, particularly in the use of external forms of employment and in supply chains. According to the stakeholders consulted, some companies use it directly to build their internal procedures.
- **NGO ecosystem, prevention, and diplomatic outreach**
    - **Strong NGO ecosystem** (e.g. La Strada, Nomada); forced-labour identification tools, including the transferable 2018–2022 inter-ministerial toolkit.
    - Good practices, including a Spanish-language FB group founded by La Strada.
    - Border Guard/police rescue with court orders, coordinated in real time with La Strada, seen as the most effective model.
    - Emerging asset: migrant self-organisation, led by the Latin American Trade Union (100+ members, OPZZ-affiliated) with real-time agency knowledge; Turkish and Indonesian unions forming.

- Ministry training for Latin American consular staff in Warsaw (October 2025, CBSS toolkit); Spanish-language materials from the Polish Embassy in Bogotá.
- **Information widely available** at multilingual portals (e-Praca, Wortal PSZ, gov.pl "Praca w Polsce") and the forthcoming "Living and Working in Poland" hub, underused but extendable at low cost via consulate and embassy links.

Weaknesses

Across Greece, Italy, Bulgaria, and Poland, human trafficking and labour exploitation remain structurally embedded in high-risk sectors. The main weaknesses in addressing this issue are driven more by poor implementation than by gaps in legislation. All four countries struggle with **under-identification of victims**, due to inconsistent screening practices, limited use of standardised indicators, and weak proactive detection in high-risk sectors. **Labour inspection** systems remain under-resourced and insufficiently specialised, reducing their preventive and investigative impact. **Judicial responses** are marked by delays and disparities, and governance frameworks are fragmented, sometimes with unclear coordination responsibilities, **insufficient inter-agency cooperation**, limited involvement of social partners and the private sector. These common weaknesses are compounded by significant **data gaps**, which undermine evidence-based policymaking and transparency, as well as **capacity and training gaps** among frontline actors. A structural threat common to all four countries is that the **fusion of immigration enforcement with labour protection**, combined with permits tied to a single employer, turns reporting into a deportation risk. Because losing a job can mean losing the right to remain, workers are deterred from reporting abuse, and legal status becomes an instrument of control, making this one of the central structural drivers of exploitation rather than a mere side effect.

Finally, **victim protection** and assistance remain inadequate. Shared areas for improvement include **labour migration** and **recruitment regulation**.

Greece

- **Inconsistent identification, insufficient data, and referral**
  - **Identification** of labour trafficking victims remains **uneven**, with varying screening practices across regional offices of the Reception and Identification Service.
  - Inconsistent use of **indicators** leads to weak referrals and insufficient access to protection.
  - **Data interoperability gaps between systems** (for example, between residence permits and ERGANI).
  - There is a l**ack of data** on inspections and cases involving temporary work agencies and supply chains, limiting insight into high-risk labour sectors.
  - Weak **engagement with the private sector** reduces opportunities for prevention, due diligence, and targeted inspections.
- **Lack of dedicated accommodation for victims**
  - Greece currently has no dedicated **shelters** or **housing** framework for trafficking victims following the closure of NGO-run facilities.
  - Victims, predominantly women, are redirected to general **emergency shelters**, which are fragmented, under-resourced and often at full capacity.
  - No accommodation options exist for male victims.
  - **Overreliance on CSOs**, who carry state tasks disproportionate to their resources.

- **Justice system limitations**
  - **Limited expertise** among prosecutors in trafficking cases and overreliance on victim testimony persist.
  - The **non-punishment principle** is inconsistently applied.
  - **Lengthy judicial proceedings** and delays undermine convictions and erode victim trust in the justice system.
  - Weak cooperation, specifically with the **Ministry of Health**.
- **Limited inspection capacity and national coverage**
  - Although inspection activity increased in 2024, a significant share occurred through **EMPACT** joint operations, indicating dependence on external frameworks.
  - **National inspection capacity** requires strengthening, including specialised expertise on trafficking, systematic monitoring and coverage of remote regions.
- **Weak social dialogue and transparency**
  - According to the Greek General Confederation of Labour (GSEE), social partners are excluded from the ONR's implementation of the National Action Plan.
  - Despite a large **undocumented workforce** in high-risk sectors, very few victims are formally identified, as highlighted by GRETA.
  - **Social tolerance of labour trafficking** and labour exploitation driven by demand for low-cost labour.

Italy

- **Insufficient detection and identification of victims due to limited or fragmented data**
  - Persistent under-detection of trafficking cases due to limited investigative capacity and inconsistent victim identification.
  - Lack of Standard Operating Procedures for identification; authorities fail to proactively detect victims among migrants and asylum seekers.
- **Justice system inefficiencies**
  - Trafficking offences, particularly labour exploitation, are often misclassified and not prosecuted as trafficking.
  - Judicial processes are slow and inconsistent; plea-bargaining is overused. Sanctions are not always proportionate or dissuasive.
- **Compensation and legal assistance gaps**
  - Access to legal aid for victims is often delayed and complicated.
  - The state compensation scheme is ineffective, capped at €1,500, and rarely accessed due to strict requirements.
  - Victims are not consistently informed of compensation rights in accessible languages.
- **Weak labour inspection and prevention mechanisms**
  - Labour inspectorates lack human and financial resources; they cannot conduct proactive or unannounced inspections.
  - Poor cooperation and data-sharing between inspectors and law enforcement.
  - Oversight in agriculture and domestic work is inadequate; informal settlements persist.
- **Institutional coordination and governance gaps**
  - The National Action Plan lacks evaluation mechanisms, performance indicators, and continuity between cycles.

    - Coordination between national, regional, and local authorities remains fragmented.
    - Insufficient cooperation with civil society, trade unions, and the private sector.
    - The absence of a coordinated support network for the workplace integration of survivors, leaving the effort dependent on individual goodwill.
- **Training and capacity gaps**
    - Professionals across sectors (law enforcement, labour inspectors, immigration staff, health workers, social services) lack regular, specialised training.
- **Migration and border management weaknesses**
    - Border screening and identification of trafficking victims remain inadequate, with inconsistent risk assessments.
    - Legal migration pathways remain limited, and reception centres are overcrowded and under-resourced.
    - **Malfunctioning of the *decreti flussi*:** Italy's legal entry channel for non-EU workers, tied to a single employer and undermined by insufficient quotas, administrative delays, fee-charging intermediaries, and fictitious job offers, leaves many unable to obtain a permit and pushed into the irregularity and dependence that enable exploitation (only 7.9% of 2025 quota places reached a permit request, Ero Straniero), turning a safeguard into a driver of exploitation.
    - Barriers to reporting and accessing help.
    - Victims often lack awareness of their rights and, due to fear of deportation and mistrust of authorities, are discouraged from reporting exploitation.
    - The **cultural barrier** to reporting (fear of retaliation, distrust, resignation, and the historical tolerance of illegality).
- **Residence permits tied to a single employer**: linking legal status to one employer deters workers from reporting abuse, a dependence deepened by cases of fictitious contracts under the *decreti flussi*.
- **Inadequate victim assistance and protection**
    - Insufficient funding and accommodation, limited access to psychological, mediation, and health services; protection measures are inconsistently applied.
- **Child protection deficits**
    - Child victims are not systematically identified or assisted.
    - Insufficient accommodation and specialised support for trafficked minors.
    - Education and child-welfare professionals lack training on child trafficking and online exploitation risks.
- **Private sector engagement challenges**
    - Businesses are insufficiently involved in identifying risks or implementing due diligence against exploitation.
    - Limited follow-up on companies' responsibilities to support victim rehabilitation and access to remedies. (United Nations Human Rights Council, 2019)

Bulgaria

- **Under-identification and detection gaps**
    - Despite the growing number of indicators of labour exploitation involving third-country nationals, very few cases are formally identified as trafficking in human beings. This highlights the need to strengthen mechanisms for early identification, referral, victim protection, and interinstitutional cooperation.
    - Hidden victims in construction, agriculture, and domestic work.

    - Limited awareness of labour rights, language barriers, and low levels of trust in public institutions reduce the likelihood of reporting exploitation and hinder the early identification of victims.
    - Reliance on informal community networks and social media for information, where fraudulent recruiters operate.
- **Limited labour inspection capacity**
    - Insufficient staff, interpreters, and mandate (e.g., private homes).
    - Labour inspectors lack resources and mandate to address exploitation comprehensively.
- **Administrative barriers**
    - Slow permit systems, unclear procedures, and employer-tied permits that discourage reporting.
- **Weak regulation of recruitment agencies**
    - Insufficient oversight of labour recruitment and mediation services, together with labour law violations, creates opportunities for abusive recruitment practices and the operation of illegal intermediaries.
    - Foreign employment agencies charging high fees, issuing deceptive contracts, and operating beyond regulatory oversight contribute to systemic risk. High and illegal fees result in debt bondage.
    - The structural imbalance in intermediary regulation (a public register exists for outgoing workers but not for incoming labour migration).
    - Intermediaries and subcontracting chains make it difficult to identify the actual employer, detect cases of labour exploitation, and establish criminal liability.
- **Weak enforcement and prosecution**
    - Although Bulgaria has strengthened legislation and international cooperation, labour trafficking remains under-identified and under-prosecuted. Penalties are frequently suspended, investigations are slow, and corruption among officials hampers effective response.
- **Legal and conceptual ambiguity**
    - The conceptual and legal ambiguity between labour-rights violations, labour exploitation, and trafficking was the difficulty most consistently raised by stakeholders.
- **Fragmented interagency coordination**
    - Fragmented interagency coordination and poor data sharing.
- **Insufficient long-term victim support**
    - Limited long-term funding for victim protection, recovery, reintegration and follow-up support increases the risk of re-victimisation.
    - Shelters are underfunded and concentrated in a few regions.
    - Short-term planning and a lack of supportive services for workers for integration.

Poland

- **Policy and strategic framework**
    - Migration policy has been weak for many years; the 2025–2030 Migration strategy, adopted only in October 2024, is too recent to assess, and implementing actors are still adjusting to new responsibilities. It is important to note that some measures were added and updated on 4 June 2025.

- **Fragmented legal and regulatory framework**
    - Labour and anti-trafficking legislation is highly fragmented across multiple acts with different objectives, making it complex to navigate and difficult to amend.
    - The 2025 Labour Market Act is very new; its impact on preventing forced labour remains unknown and highly dependent on enforcement capacity and resources.
    - There is no comprehensive normative system addressing trafficking and labour exploitation across criminal, migration, social assistance, victim protection, data protection, public benefit, and labour-market legislation. The 2010 criminal definition of trafficking requires several criteria to be met at once, so very few cases are prosecuted, and permits tied to a single employer make job loss an automatic loss of legal status, a coercive mechanism built into the law.
    - Judicial outcomes in forced-labour cases are low, owing to prosecutorial and judicial inconsistency in applying the legal definition, so perpetrators can continue operating.
- **Governance and coordination gaps**
    - No single primary authority is clearly mandated to coordinate the response to labour trafficking.
    - Existing coordination structures do not systematically include businesses and trade unions, and the one regular multi-stakeholder forum is no longer held.
    - The National Referral Mechanism is in practice a guidance document, not an administrative procedure, with no binding decision timeline and no right of appeal.
- **Data and evidence gaps**
    - Lack of a standardised approach to data collection and the absence of unified statistics result in low official identification rates that do not reflect the true scale or geography of the problem. Forced labour is further undercounted because qualifying cases are often redirected to labour courts as minor violations, outside the anti-trafficking system.
- **Weak identification, prosecution, and victim protection**
    - Identification, prosecution, and victim protection remain weak: few criminal proceedings and convictions, limited understanding of forced labour among law enforcement and courts, and fragmented victim support (legal aid, medical care, safe housing, residence permits).
    - Procedural barriers trap victims after identification: legalisation can exceed 700 days, keeping them dependent on the agency or pushing them into informal work.
- **Capacity constraints of frontline actors**
    - Low legal knowledge and weak foreign-language skills (e.g. Ukrainian, English) among many frontline officials limit communication with migrants and hinder detection and investigation.
    - State services struggle to identify victims proactively, leaving NGOs to carry much of the burden. Interpretation is a critical bottleneck, since sworn-interpreter lists are short, some languages have none in Poland, and the law does not clearly authorise AI-assisted interpreting.
    - PIP is understaffed and focused on formal legality rather than forced-labour indicators; inspectors also cannot verify wages paid in cash or through side



contracts and are physically blocked from workers during agency-site inspections.

- **Limited corporate and demand-side accountability**
    - Corporate accountability remains limited as there are no effective mechanisms to hold legal persons criminally liable for trafficking and forced labour, and end-users of forced-labour services are not criminalised.
    - Subcontracting liability is conditional, reducing its deterrent effect, and there is no general joint-liability rule making user-employers responsible for wages owed by a failed agency.
    - Persistent impunity of legal persons and end-users' risks sustaining demand. Corporate awareness is critically low, with businesses associating forced-labour risk only with Asian supply chains, and the Omnibus deregulation of the CSRD and CSDDD has removed the main compliance driver.
    - HR/co-employment accountability vacuum (HR legally barred from monitoring outsourced workers, oversight defaulting to procurement).

Opportunities

Shared opportunities to strengthen the prevention of and response to human trafficking and labour exploitation are represented mainly by a **robust EU-level legal and policy framework, and favourable funding opportunities**. The revised **EU anti-trafficking and corporate due diligence directive (EU, 2026/470)**, together with access to **EU funding instruments**, creates conditions to enhance labour inspections, victim identification and assistance, awareness-raising, and training for key actors. Existing **international and cross-border cooperation** mechanisms support coordinated investigations and information exchange. Additional opportunities include strengthening **the regulation of recruitment intermediaries**, fostering ethical recruitment, improving the use of data and digital tools for risk-based enforcement, and increasing private-sector accountability through due diligence and transparency. Across all four countries, **labour-market demand and existing integration and safeguarding practices** create a **favourable external condition** to reduce vulnerability to trafficking and labour exploitation. All four countries stand to benefit from stronger multi-stakeholder collaboration and from leveraging existing instruments and mechanisms more fully, by extending their reach, improving their effectiveness, and scaling up what already works. Furthermore, employment and skills programmes for victims and migrants can be expanded, cooperation among key actors strengthened, and targeted inclusion measures for foreign workers introduced. **AI translation tools** have good potential, if used as a low-cost complement to human interpreters rather than a replacement, to bridge the language barrier that stands in the way of informing workers and raising awareness of their rights. They can convey information on contracts, wages, and, above all, rights and available support in workers' own languages, giving vulnerable people the confidence to take the decisive first step of contacting the authorities.

Greece

- **European funding opportunities**
    - Greece can further strengthen its anti-trafficking efforts by capitalising on the favourable funding landscape offered through European and international programmes. These resources offer an important opportunity to expand and sustain targeted initiatives, particularly in awareness-raising and public engagement. By investing in regular, nationwide campaigns, Greece can raise awareness of trafficking issues, foster a culture of social responsibility, and

encourage citizens, workers, and businesses to report suspected cases more proactively.

- **Leveraging existing instruments and improving access to reporting**
    - The Odyssey employer-vetting programme and the IRIS ethical-recruitment certification already provide workable, proven prevention tools that could be scaled up and extended to more sectors and employers, strengthening safe and transparent recruitment.
    - Introducing anonymous reporting mechanisms and clearer, accessible information on rights and protections would substantially improve migrants' ability to seek help, addressing one of the main barriers to detection identified by participants.

Italy

- **EU funding programmes**
    - Available EU funds offer wide opportunities to strengthen prevention, enforcement, coordination, and systemic resilience against labour exploitation and human trafficking.
    - The European Social Fund Plus (ESF+) and AMIF can further support vulnerable and affected populations in accessing employment, housing, and social integration, helping them move towards safe and sustainable autonomy.
    - The EMBRACE multi-stakeholder platform is the headline forward-looking opportunity for Italy.
- **Strengthened international guidance and monitoring.**
    - Italy benefits from recommendations provided by the 2024 GRETA report (GRETA, 2024), which outline a structured path for reforms in access to justice, victim compensation, and labour-exploitation monitoring.
    - Ongoing engagement with GRETA, combined with Italy's active role in the EU EMPACT initiative, enhances technical support, peer learning, and compliance incentives.
- **Expanded international cooperation and information exchange.**
    - Strong channels for cross-border collaboration through liaison officers, Interpol, Europol, and Eurojust, as well as multiple bilateral agreements with key countries of origin or transit (e.g., Nigeria, Libya, Egypt), with a new agreement under negotiation with Bangladesh.
    - The National Anti-Mafia and Anti-Terrorism Directorate (DNA) further reinforces cooperation through bilateral and multilateral agreements with partners such as Nigeria, the UK and the U.S., supporting extradition, mutual legal assistance, detainee transfer, and coordinated prosecution.
    - **A.L.T. Caporalato** (Actions for Legality and Labour Protection), an initiative funded by the Ministry of Labour and led by the INL (*Ispettorato Nazionale del Lavoro*) to prevent and counter the labour exploitation of migrant workers in agriculture, logistics, construction, and manufacturing across nine Italian regions. The action provides a strong practice that can be extended and replicated.
- **Trend of consolidating and strengthening legal instruments that encourage reporting of exploitation.**
    - Although the criminalisation of irregular stay can discourage reporting, mechanisms exist for inspectors to request temporary residence permits for exploited workers.

- **Improved access to inclusion pathways for victims and refugees through cooperation between UNHCR and local anti-trafficking networks.**
    - Cooperation between UNHCR and local anti-trafficking networks facilitates labour-market access, particularly for refugee women. Victims of trafficking who hold international protection status can access broader integration programmes.

- **Inclusion of migrant-owned businesses in local SME associations**: involving third-country national entrepreneurs in local business associations offers mutual benefits, giving them access to networks, training, and support while increasing transparency and fair competition, and reducing the community isolation that can conceal exploitation.

Bulgaria

- **EU legal momentum**
    - Revised EU Trafficking Directive (2024) and due diligence rules support stronger supply-chain oversight and recruiter accountability.
- **EU funding opportunities**
    - Such as AMIF, ESF+, and international partners for prevention, integration, and inspections.
- **Targeted labour inspection strategies** for high-risk sectors and subcontracting chains.
    - Improved victim identification systems at borders, reception centres, and labour inspections.
- **Digitalisation** of migration and labour administration for transparency.
    - Private-sector engagement in ethical recruitment and worker protection.
- **Bilateral recruitment agreements** with source countries that can reduce reliance on informal intermediaries.
    - Increase capacity to offer programs for inclusion and belonging with a focus on foreign workers. The "Solidarity" programme, bilateral memoranda, and migrantlife.bg represent scalable opportunities.

Poland

- **Incoming EU Forced Labour Regulation**
    - EU Forced Labour Regulation, formally Regulation (EU) 2024/3015 of the European Parliament and of the Council on prohibiting products made with forced labour on the Union market, banning forced-labour products from the EU market, applies to all companies (unlike CSDDD). Applies from 14 December 2027. Commission guidelines published in June 2026.
- **Stabilisation of the migration situation**
    - A more stable number of Ukrainian refugees creates conditions for long-term integration planning and the design of sustainable support systems.
- **Labour market dynamics**
    - Growing demand for both low- and high-skilled workers in Poland can facilitate the labour market integration of foreign workers when combined with existing and recommended safeguards for adoption.
- **Regulation of employment agencies**
    - Clearer accountability standards simplify and secure legal hiring.
    - Dutch/Scandinavian joint-liability model inspiration: any entity using non-employee labour is jointly liable for at least the minimum wage and must keep

working-time records. Inspectors rate it the single most impactful reform, since it collapses subcontracting chains into a verifiable bilateral relationship.

- **Use of evidence on non-standard work**
  - OECD and national statistics on non-standard forms of work can inform reforms aimed at reducing bogus self-employment and extending social-security coverage to currently excluded groups.
  - Inspiration from the Lithuanian model in force since 2023: Structured worker questionnaires (wages, accommodation, discrimination, contracts) as due diligence that can exclude liability under a *dolus eventualis* standard.
- **Potential to reshape corporate behaviour.**
  - If enforced, mandatory reporting and transparency can gradually make tolerating trafficking/forced labour operationally and reputationally unprofitable.
  - New compliance triggers: Consumer Empowerment Directive penalties and UOKiK enforcement against false social and environmental claims (a financial risk boards understand); potential for collective consumer litigation.
  - Low-cost multipliers: peer-to-peer audit sharing (already practised in the food sector); a cross-sectoral working group on the palm oil roundtable model; large firms briefing their SME suppliers.
  - Consumer-awareness campaigns using the platform-work economy as an entry point.
- **Impact of the general EU trends**
  - Poland might benefit from EU-wide developments on corporate sustainability due diligence and anti-trafficking standards.
  - Transferable models: UK NRM (5-day decision, online submission, right of appeal); pre-2025 US separation of immigration enforcement from policing (criminalising immigration-status blackmail).
  - Large public projects (nuclear plant, airport) as entry point to embed due diligence via "Local Content"; proposed EU exclusion register linking procurement to labour-rights liability.
- **EU funding opportunities**
  - Funding of projects like EMBRACE that help develop practical tools needed by various stakeholders, including businesses.
- **Emerging coordination platforms**
  - New inter-ministerial committee (Ministry of Development and Technology, first meeting March 2026) with a working group on due diligence and CSDDD transposition; most viable cross-ministerial platform, potentially replacing the discontinued Ministry conference.
  - Trade unions as an untapped identification asset: formal inclusion in the NRM would extend victim identification at no new cost; exploitation is demonstrably rarer where unions are active.
  - Verified pre-departure information (Spanish-language, via embassies, consulates, ministry sites, plus paid social media); the multilingual "Living and Working in Poland" portal as a ready channel.
  - Standardisable contract clauses (existing unjust enrichment/offset basis): termination on serious violations, direct wage payment to agency workers.
  - Local-government integration model (Prusice: cultural-centre space, language classes, institutional visibility).

Threats

In **Greece, Italy, Bulgaria, and Poland**, common threats to preventing and combating human trafficking and labour exploitation arise from **structural demand for cheap and flexible labour**, widespread **informality and precarious employment**, and **migration-related vulnerabilities** linked to **geopolitical instability** and **migration frameworks**. These risks are reinforced by **insufficient and unstable funding** for anti-trafficking systems, **shortcomings in the implementation and enforcement of existing laws**, and **abusive patterns in subcontracting, intermediaries, and recruitment chains**. Furthermore, **external economic pressures** and **global competition** create incentives for cost-cutting that can reinforce exploitative labour models across the EU. Fast-growing **digital and platform-based recruitment and exploitation** is a cross-cutting threat. Recruitment through social media and online job offers is hard to distinguish from legitimate referrals and difficult to regulate, while platform and gig-economy models may conceal exploitation. Finally, the escalation of armed conflicts, geopolitical shocks, and the climate crisis may **increase the inflow of migrants**, straining the EU's migration management and protection systems.

Greece

- **Unstable and insufficient funding**
  - Securing stable, long-term funding remains a major risk, particularly in the context of the forthcoming National Action Plan.
  - Financial uncertainty threatens the sustainability of awareness campaigns, quality of victim support services, and evidence-based monitoring.
  - Civil society organisations, which play a critical role in victim identification, legal aid, housing, and reintegration, are especially vulnerable to funding gaps.
- **Implementation and governance gaps**
  - Despite a comprehensive legal framework, inconsistencies in implementation, coordination and enforcement risk undermining effectiveness across prevention, protection, and prosecution.
  - As noted by GRETA, coordination and monitoring functions remain insufficiently separated, both falling under the Office of the National Rapporteur (ONR), contrary to Article 29 of the Council of Europe Convention.
  - Weak implementation mechanisms and limited independent monitoring may reduce the practical impact of anti-trafficking legislation.
- **Structural economic drivers of exploitation**
  - Greece's large informal economy, persistent undeclared work and high demand for cheap, flexible, and seasonal labour create favourable conditions for labour trafficking.
  - These structural vulnerabilities, combined with the organised-crime nature of trafficking, increase the risk that exploitation will persist or expand despite legal and policy efforts.

Italy

- **Restrictive migration and asylum frameworks on the national and international levels**
  Limited legal migration pathways, overcrowded and under-resourced reception systems, and EU policies prioritising border control (e.g. Regulation (EU) 2024/1351) push migrants into irregularity. This significantly increases vulnerability to trafficking, re-trafficking and re-victimisation, particularly for individuals returned to Italy without adequate reception or protection measures.

- **Political instability and humanitarian crises in countries of origin and transit**
  Ongoing conflict, poverty, climate crisis, and political and social instability in sub-Saharan Africa and Libya generate large-scale mixed migration flows. Specifically, lawlessness in Libya, including detention centres marked by severe human rights abuses, creates a systemic environment of exploitation that facilitates trafficking and re-trafficking before migrants reach Europe.
- **External migration management agreements undermining protection principles**
  The implementation of international agreements such as the Italy–Libya Memorandum of Understanding results in interceptions and forced returns to Libya, exposing migrants to torture, slavery, forced labour and sexual exploitation. These practices weaken anti-trafficking prevention efforts and undermine the principle of non-refoulement.
- **Strong demand for cheap and flexible labour and sexual services**
  Structural demand in sectors such as agriculture, domestic work, construction, and the sex industry, driven by informal economic models and cost-cutting practices, creates fertile ground for exploitative labour arrangements that traffickers and abusive employers' exploit.
- **Influence and adaptability of transnational criminal organisations**
  International trafficking networks, including highly organised and adaptable syndicates (notably Nigerian networks), exploit migration routes, reception system gaps and economic demand, maintaining resilient and transnational trafficking operations.
- **Macroeconomic pressures and global market competition**
  Intense international competition, particularly in agriculture and textiles, drives outsourcing and subcontracting with limited oversight. Complex and non-transparent supply chains increase the risk of labour exploitation and trafficking.
- **Misuse of digital technologies by traffickers**
  The widespread availability and interconnection of ICT and social media enable traffickers to recruit vulnerable people through deceptive online job offers while shifting exploitation into less visible digital spaces. The speed, anonymity and internationalisation of digital platforms and tools often outpace regulatory and law enforcement capacities.

Bulgaria

- **Labour market imbalance and pressure**
  - Growing demand for foreign labour and persistent shortages raise the risk of irregular recruitment and exploitation, especially in construction, agriculture, manufacturing, transport, logistics, tourism and HORECA.
  - Demographic decline pushes employers to recruit quickly, which can lead to inadequate recruitment practices and weak due diligence.
- **Vulnerability, debts, and employer inexperience**
  - Many third-country nationals arrive in Bulgaria already in debt to recruitment agencies or intermediaries in their home countries. This deepens their dependence on employers and their exposure to exploitation.
  - Low awareness of labour rights, language barriers, and distrust of public institutions discourage reporting and delay victim identification.
  - Employers face rising recruitment and retention costs and have little experience with ethical recruitment and integration of foreign workers. The result is high turnover and greater reliance on intermediaries.
- **Complex intermediation and subcontracting chains**

    - The growing use of intermediaries and complex subcontracting chains obscures who the actual employer is. That makes exploitation harder to detect and criminal liability harder to establish.
- **Gaps in identification and victim protection**
    - Indicators of exploitation involving third-country nationals are increasing, yet very few cases are formally identified as trafficking in human beings. This shows the need for stronger early identification, referral, victim protection and inter-institutional cooperation.
    - Limited long-term funding for victim protection, recovery, reintegration, and follow-up raises the risk of re-victimisation.

Poland

- **Migration trends and public opinion**
    - Escalation of the war in Ukraine may increase the inflow of migrant workers, straining Poland's migration management and protection systems.
    - Strong dependence on Ukrainian labour means any change in flows or legal status could disrupt key sectors, pushing businesses to scramble for workforce and turn to rogue agencies and suppliers.
    - Deteriorating public attitudes may also translate into the workplace, where certain migrant groups can find themselves at the lower end of an informal hierarchy and face less favourable conditions than others.
- **Labour-market structures enabling exploitation of migrants**
    - Growing numbers of foreign workers increase trafficking and exploitation risk, especially in sectors reliant on flexible or low-cost labour.
    - Parts of the employment-agency sector, including third-country-based **intermediaries**, may engage in abusive practices such as excessive fees or exploitative contract clauses, as ongoing investigations suggest.
- **Structural informality and precarious employment**
    - A large share of workers, including migrants, work outside standard employment relationships, reducing access to core labour rights (working-time limits, paid leave) and to social-insurance benefits (sickness, maternity, parental leave).
    - High prevalence of non-standard and informal work keeps many outside effective legal and social protection, directly increasing vulnerability to exploitation and trafficking.
    - Social acceptance of work without contracts and the normalisation of bogus self-employment and civil-law contracts undermines labour-law protections and sustain a "grey zone" that particularly affects migrant workers.
- **Labour-market intermediation and subcontracting risks**
    - Heavy reliance on employment agencies, including entities with linked operations outside the EU, creates risks for job stability, working conditions, and compliance for migrant workers.
    - Complex, **multi-layer subcontracting chains**, including cross-border elements, make it difficult to prove knowledge or meet the conditions for joint and several liability, limiting its deterrent effect. Regardless of legal form, these arrangements make it structurally impossible to hold any single actor accountable.

    - A further, less-regulated layer sits below temporary work agencies: transport and logistics firms outsource packing, handling, and warehousing as "logistics services" (VAS) to subcontractors over whom the contracting company exercises virtually no oversight of who does the work, in what conditions, or for what pay.
- **Legal complexity and enforcement vulnerabilities**
    - Fragmented, complex legislation creates interpretation ambiguities, enforcement gaps, and loopholes that traffickers and abusive employers can exploit.
    - Implementation and enforcement gaps risk turning transparency and liability rules into formalities where resources, political will, and oversight are insufficient.
    - The deliberate separation of the employer of record (agency) from the de facto employer (client company) creates an accountability gap that standard inspection procedures do not bridge; documented indicators of forced labour, excessive hours, coercive attendance, and substandard accommodation go unidentified and unaddressed during inspections.
    - Processing speed compounds this by favouring agencies over legal migration channels: an employer declaration (*oświadczenie*) can be registered in seven days, whereas a work permit takes at least a month and often several, creating a structural incentive to use intermediaries and driving workers into agency dependency and vulnerability, regardless of intent.
- **Reliance on market mechanisms and shifting regulatory climate**
    - Reliance on market mechanisms, reputational risk, and investor pressure may be insufficient to drive compliance where external scrutiny is weak.
    - A shifting EU and US regulatory climate, including any weakening of RBC, BHR, or ESG rules internationally, could further reduce external pressure on companies operating in or from Poland.
- **Deportation risk and the immigration–protection nexus**
    - With no firewall between labour protection and immigration enforcement, PIP's statutory duty to report undocumented workers to the Border Guard or police turns a protection mechanism into a deportation tool, systematically deterring victims from formal channels.
- **Concealment, disinformation, and underestimation of scale**
    - Systemic disinformation in countries of origin distorts the picture before departure: fake accounts and fraudulent offers dominate, warning content is suppressed on social media, and no verified, accessible workers' language channel exists.
    - Local corruption risks: in smaller towns, collusion between local law enforcement and agency operators gives perpetrators advance warning and protection, and a single dominant employer may exercise de facto control over local administration, inspection priorities, and political discourse, making violations invisible by design and leaving workers no realistic avenue for redress.
    - Platform and gig-economy models add unregulated risk: platforms are admitted into employer federations, legitimising their model without scrutiny of working conditions, while lobbying blocks proper implementation of the Platform Work Directive.
    -



STRENGTHS	WEAKNESSES
• All four countries treat trafficking (THB) as a serious human-rights violation and a cross-sectoral governance concern. • A structurally aligned, multi-agency, victim-centred approach based on EU and international standards (Directive 2011/36/EU, Council of Europe Convention, Palermo Protocol). • All have a formal or operational National Referral Mechanism (NRM) or equivalent. • Established institutional coordination mechanisms. • A strong NGO and civil-society ecosystem, with international involvement (IOM and UNHCR; GRETA monitoring). • Awareness and prevention initiatives and campaigns in all four. • EMPACT (European Multidisciplinary Platform Against Criminal Threats), implemented with Europol and the European Labour Authority, is a structured channel for cross-border cooperation against organised crime, including trafficking for labour exploitation.	• Weaknesses stem more from implementation than from legislative gaps. • Under-identification of victims: inconsistent screening, limited standardised indicators, weak proactive detection in high-risk sectors. • Definitional problem: labour-rights violations, labour exploitation and trafficking are hard to distinguish. • Data gaps undermining evidence-based policy; capacity and training gaps among frontline actors. • Labour inspection under-resourced and insufficiently specialised. • Judicial delays and disparities in outcomes. • Fragmented governance, unclear coordination roles, and limited involvement of social partners and the private sector. • Weak regulation and oversight of recruitment intermediaries. • Inadequate victim protection and assistance; labour-migration and recruitment regulation need strengthening.
OPPORTUNITIES	**THREATS**
• Robust EU framework: the revised Anti-Trafficking Directive (2024/1712) strengthens identification, referral, and coordination, and the Forced Labour Regulation (from December 2027) adds accountability, although the Omnibus I Directive (2026/470) narrowed corporate due diligence rules. • Favourable EU funding (e.g. AMIF, ESF+) for prevention, victim support, awareness, and training. • Stronger multi-stakeholder collaboration and fuller use of existing instruments, scaling up what already works. • Stronger regulation of recruitment intermediaries; private-sector accountability through due diligence and transparency. • Cross-border cooperation mechanisms for coordinated investigations and information exchange. • Demand for workers enabling regular integration, and existing integration and safeguarding practices. • Employment and skills programmes and inclusion measures for victims, migrants, and foreign workers. • AI translation, as a low-cost complement to human interpreters (where legally recognised), to bridge language barriers and raise workers' rights awareness.	• Fear of deportation deters reporting, driven by the fusion of immigration enforcement and employer-tied permits, a central structural driver. • Structural demand for cheap and flexible labour, widespread informality, and precarious employment. • Migration-related vulnerabilities linked to geopolitical instability and restrictive migration frameworks. • Insufficient, unstable funding for anti-trafficking systems, notably victim support and civil society. • Implementation and enforcement gaps; abusive patterns in subcontracting and intermediaries. • Adaptable transnational organised crime exploiting migration routes, reception gaps, and economic demand. • Global competition and economic pressure incentivising exploitative labour models. • Weaker EU corporate due diligence rules (Omnibus I), reducing pressure on companies to prevent forced labour. • Fast-growing digital and platform-based recruitment and exploitation. • Escalating conflict, geopolitical shocks, and the climate crisis increasing migrant inflows and straining migration and protection systems.

Figure 4. Cross-cutting SWOT: strengths, weaknesses, opportunities, and threats shared across Greece, Italy, Bulgaria, and Poland. Source: EMBRACE, 2026

Conclusion

All four countries (Greece, Italy, Bulgaria, and Poland) have **established legal and institutional frameworks against human trafficking and labour exploitation**, largely in line with EU and international standards. The **key challenge** is less the absence of legislation than its **implementation**: gaps between formal rules and daily practice limit prevention, victim identification, protection, and prosecution.

Greece is mainly a country of destination and transit, where labour exploitation is the predominant form of trafficking. The rise in detected cases reflects both a growing phenomenon, reported by inspectors and CSOs alike, and more targeted enforcement in agriculture. Men are exploited mostly in agriculture and women in domestic work, and many victims are asylum seekers or undocumented. Stakeholders describe exploitation embedded in informal labour markets, from cleaning and construction to food delivery, with recruitment through social media and, in some cases, exploiters obtaining asylum documentation for victims to appear lawful. Support services are hard to reach, civil society carries much of the burden, and smaller businesses lack the resources and guidance to act. Some tolerance persists because labour-intensive sectors depend on low-cost workers.

Italy is a destination and transit country where labour exploitation is long-standing and deeply rooted, and its profile is changing. Among identified victims, men now outnumber women, in line with the growth of severe labour exploitation in agriculture, logistics, construction and textiles. Domestic and care work, performed mainly by migrant women, remains largely hidden inside private homes. Agricultural exploitation runs through gang-master intermediation (*caporalato*), concentrated in the South. The legal entry route for non-EU workers (*decreti flussi*) has itself become a channel of vulnerability: workers pay intermediaries and arrive to find the job does not exist.

Bulgaria is shifting from a country of origin and transit towards a destination, as labour shortages increase reliance on third-country workers, recruited more and more from Central and South Asia. Recorded cases still mostly involve Bulgarian nationals and sexual exploitation, although forced labour among identified victims is rising, and stakeholders stress a gap between official statistics and reality on the ground. They describe widespread concealed exploitation behind formally lawful employment, with contracts used to secure permits and conditions changing on arrival, mainly in seasonal and intermediary-driven sectors such as agriculture, construction, manufacturing, hospitality and domestic work. Migrants rely heavily on informal community networks and often do not see themselves as victims, while young people leaving protection systems are especially exposed.

Poland has moved from a country of emigration to an increasingly attractive destination for migrant labour, and labour exploitation is now the main form of trafficking identified. The foreign workforce is growing and diversifying: Ukrainians are the largest group, while workers from Latin America and Asia are also recruited, although the visibility of Latin American workers may reflect their capacity to advocate rather than higher prevalence. Risk concentrates in temporary employment agencies and long subcontracting chains, where deceptive recruitment, debt and diffuse responsibility hinder accountability, and some agencies now present themselves as charities or cultural associations. Enforcement bodies are active, yet coordination and accountability on the demand side remain limited.

The **SWOT** shows a shared pattern in all four countries: solid frameworks, weaker practice. Shared EU and international standards, referral mechanisms, active civil society and cooperation through EMPACT provide a strong foundation. Yet victims remain under-identified, and labour violations, exploitation and trafficking are hard to tell apart. Inspections, data, training, and coordination fall short, with little involvement of social partners and the private sector. Weakly regulated recruitment intermediaries are the point where risk concentrates, within a wider context of demand for cheap and flexible labour, informality, and abusive subcontracting chains. Employer-tied status, restrictive migration frameworks and unstable funding reinforce these risks, as do newer pressures such as platform-based recruitment, geopolitical shocks, and the climate crisis. Opportunities lie in the revised EU anti-trafficking framework, although the narrowing of corporate due diligence rules weakens one expected lever. AMIF and ESF+ funding and stronger multi-stakeholder cooperation, scaling up what already works, offer further openings. Better regulation of intermediaries, together with better data and digital tools for risk-based enforcement, could help close the gap between legal commitments and practice.

References

A. Reports, studies, data and web sources

Blangiardo, G.C. (2026) 'The foreign population in Italy: numbers and trends', in Codini, E. and Ortensi, L.E. (eds.) *31st Italian report on migrations 2025*. Milan: Fondazione ISMU ETS, pp. 7–19. Available at: https://www.ismu.org/wp-content/uploads/2026/05/31st-Italian-Report-on-Migrations-2025.pdf (Accessed: 8 October 2026).

Dudkowiak & Putyra (2025) *Attention employers: new labor law regulations are now in force*. Available at: https://www.dudkowiak.com/blog/attention-employers-new-labor-law-regulations-are-now-in-force/ (Accessed: 15 October 2026).

Ero Straniero (2026) *Decreto flussi 2026: dossier di monitoraggio* [Flows decree 2026: monitoring dossier]. Available at: https://erostraniero.it/dossier2026flussi/ (Accessed: 15 October 2026).

EUCPN (2019) *Greek policy on trafficking in human beings*. European Crime Prevention Network. Available at: https://eucpn.org/document/greek-policy-on-trafficking-in-human-beings (Accessed: 15 October 2026).

EUR-Lex (n.d.) *ILO Forced Labour Protocol: ratification by EU countries (summary)*. Available at: https://eur-lex.europa.eu/EN/legal-content/summary/ilo-forced-labour-protocol-ratification-by-eu-countries.html (Accessed: 15 October 2026).

EURES (2025) *Labour market information: Bulgaria*. European Commission, 24 February. Available at: https://eures.europa.eu/living-and-working/labour-market-information/labour-market-information-bulgaria_en (Accessed: 8 October 2026).

European Commission (n.d.) *Greece: together against trafficking in human beings*. Directorate-General for Migration and Home Affairs. Available at: https://home-affairs.ec.europa.eu/policies/internal-security/organised-crime/together-against-trafficking-human-beings/eu-countries/greece_en (Accessed: 17 March 2026).

European Commission (2026) *Guidelines on the application of Regulation (EU) 2024/3015 on prohibiting products made with forced labour on the Union market*: Commission Notice. Available at: https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/3b159733-6cdf-4f9e-8b30-80580c0679d8/download (Accessed: 15 October 2026).

Europol (n.d.) *EMPACT 2026-2029 Fighting crime together*. Available at: https://www.europol.europa.eu/how-we-work/empact (Accessed: 15 October 2026).

Eurostat (2026a) *9 678 registered victims of human trafficking in 2024*. European Commission, 29 January. Available at: https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20260129-1 (Accessed: 8 October 2026).

Eurostat (2026b) *Trafficking in human beings statistics*. Statistics Explained, data extracted January 2026. European Commission. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Trafficking_in_human_beings_statistics (Accessed: 8 October 2026).

Eurostat (2026c) *Victims of trafficking in human beings by all forms of exploitation [crim_thb_vexp]*. Data last updated 29 January 2026. European Commission. Available at: https://doi.org/10.2908/CRIM_THB_VEXP (Accessed: 8 October 2026).

Faracik, B. (ed.) (2020) *Praca przymusowa. Poradnik: jak ją rozpoznać i jej przeciwdziałać* [Forced labour: a guide on how to recognise and counter it]. Working Group on Relations with

Persons Performing Work, Team for Sustainable Development and Corporate Social Responsibility, Ministry of Funds and Regional Policy. Available at: https://www.gov.pl/attachment/c3b90a5e-4a1d-46ca-a1cf-1a5ed98e17fc (Accessed: 15 October 2026).

Fundacja La Strada (2024) *Sprawozdanie za rok 2024* [Annual report 2024]. Available at: https://strada.org.pl/wp-content/uploads/2025/11/Sprawozdanie-za-rok-2024-LAST.pdf (Accessed: 8 October 2026).

Generation 2.0 for Rights, Equality & Diversity (RED) and SolidarityNow (2025) *Revealing the unseen: joint research study*. Available at: https://www.solidaritynow.org/wp-content/uploads/2025/02/Joint-Research_Revealing-the-Unseen-ENG.pdf (Accessed: 12 October 2026).

Group of Experts on Action against Trafficking in Human Beings (GRETA) (2017) *Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Greece: second evaluation round*. GRETA(2017)27. Strasbourg: Council of Europe. Available at: https://rm.coe.int/greta-2017-27-fgr-gre-en/168075f2b6 (Accessed: 15 October 2026).

Group of Experts on Action against Trafficking in Human Beings (GRETA) (2023) *Evaluation report: Poland. Access to justice and effective remedies for victims of trafficking in human beings. Third evaluation round*. GRETA(2023)08. Strasbourg: Council of Europe. Available at: https://rm.coe.int/greta-evaluation-report-on-poland-3rd-evaluation-round-greta-2023-08-a/1680ab7039 (Accessed: 8 October 2026).

Group of Experts on Action against Trafficking in Human Beings (GRETA) (2024) *Evaluation report: Italy. Access to justice and effective remedies for victims of trafficking in human beings. Third evaluation round*. GRETA(2024)03. Strasbourg: Council of Europe. Available at: https://rm.coe.int/greta-2024-03-fgr-ita-en-2750-4314-7273-1/1680ae9f81 (Accessed: 8 October 2026).

Group of Experts on Action against Trafficking in Human Beings (GRETA) (2025) *Evaluation report: Bulgaria. Fourth evaluation round: measures to prevent and detect vulnerabilities to human trafficking*. GRETA(2025)09. Strasbourg: Council of Europe. Available at: https://rm.coe.int/greta-evaluation-report-on-the-implementation-of-the-council-of-europe/488028c47a (Accessed: 8 October 2026).

Helak, M. and Eurofound (2025) *Adoption of Poland's Migration Strategy 2025–2030* (case PL-2024-42/3822). EU PolicyWatch database. Available at: https://static.eurofound.europa.eu/covid19db/cases/PL-2024-42_3822.html (Accessed: 15 October 2026).

Iglicka, K. and Ziółek-Skrzypczak, M. (2010) 'EU membership highlights Poland's migration challenges', *Migration Information Source*, 1 September. Migration Policy Institute. Available at: https://www.migrationpolicy.org/journal/country-profile/eu-membership-highlights-polands-migration-challenges (Accessed: 8 October 2026).

Inter-Ministerial Team for Counteracting Trafficking in Human Beings (IMT) (2025) *National action plan against trafficking in human beings 2025–2027*. Document adopted by the Council of Ministers. Available at: https://www.gov.pl/attachment/086bb484-3761-4035-b46e-dcb16170f4f2 (Accessed: 8 October 2026).

International Labour Organization (n.d.) *NORMLEX: information system on international labour standards*. Available at: https://normlex.ilo.org (Accessed: 8 January 2026).

Ministry of Family, Labour and Social Policy (MRPiPS) (2025a) *Informacja o zatrudnieniu cudzoziemców w Polsce – 2024 rok* [Information on the employment of foreigners in Poland, 2024]. Department of the Labour Market, Economic Migration Policy Unit.

Available at: https://psz.praca.gov.pl/documents/10828/8179096/Informacje+o+zatrudnieniu+cudzoziemc%C3%B3w+w+Polsce+-+2024.pdf/bd1f2494-cd1a-498c-070e-540e763f5044 (Accessed: 8 October 2026).

Ministry of Family, Labour and Social Policy (MRPiPS) (2025b) *That's a given: labour market laws will come into effect on 1 June 2025*. Available at: https://www.gov.pl/web/family/thats-a-given-labour-market-laws-will-come-into-effect-on-1-june-2025 (Accessed: 15 October 2026).

National Labour Inspectorate (PIP) (2026) *Podsumowanie działalności PIP 2025* [Summary of activities 2025]. Available at: https://www.pip.gov.pl/files/130/Sprawozdania/1211/PDPIP2025pdf (Accessed: 15 October 2026).

Naydenova, K. (2025) 'От Узбекистан до Непал: Скок на чуждестранните работници в България' [From Uzbekistan to Nepal: surge in foreign workers in Bulgaria], *Economic.bg*, 19 June. Available at: https://www.economic.bg/bg/a/view/ot-uzbekistan-do-nepal-skok-sa-chujdestrannite-rabotnici-v-bylgarija (Accessed: 8 October 2026).

Numero Verde Antitratta (2026) *Relazione finale Numero Verde Antitratta 2025* [Final report of the national anti-trafficking helpline 2025]. Osservatorio interventi tratta. Available at: https://osservatoriointerventitratta.it/wp-content/uploads/2026/05/Relazione-finale-Numero-Verde-2025.pdf (Accessed: 8 October 2026).

Office of the National Rapporteur on Human Trafficking (ONR) and National Centre for Social Solidarity (EKKA) (2025) *NRM annual report 2024*. Hellenic Republic, Ministry of Foreign Affairs. Available at: https://ekka.org.gr/images/KOINONIKON-PAREMBASEON/%CE%95%CE%9C%CE%91/NRM_REPORT_2024_finC.pdf (Accessed: 8 October 2026).

Office of the National Rapporteur on Human Trafficking (ONR) and National Centre for Social Solidarity (EKKA) (2026) *Annual report 2025: National Referral Mechanism for the Protection of Human Trafficking Victims (January–December 2025)*. Available at: https://ekka.org.gr/images/KOINONIKON-PAREMBASEON/%CE%95%CE%9C%CE%91/NRM_REPORT2025.pdf (Accessed: 8 October 2026).

Statistics Poland (2026) *Foreigners performing work in Poland in January 2026*. News release, 7 July. Available at: https://stat.gov.pl/en/experimental-statistics/human-capital/foreigners-performing-work-in-poland-in-january-2026,12,39.html (Accessed: 8 October 2026).

UNHCR (2024) *ILO Convention C189: Domestic Workers Convention*. Available at: https://rimap.unhcr.org/node/40651?country_nid=7 (Accessed: 15 October 2026).

United Nations Human Rights Council (2019) *Report of the Special Rapporteur on contemporary forms of slavery, including its causes and consequences: visit to Italy*. 25 July. Available at: https://documents.un.org/doc/undoc/gen/g19/226/55/pdf/g1922655.pdf (Accessed: 15 October 2026).

U.S. Department of State (2024) *Trafficking in persons report: Italy*. Office to Monitor and Combat Trafficking in Persons. Available at: https://www.state.gov/reports/2024-trafficking-in-persons-report/italy (Accessed: 8 October 2026).

Zanfrini, L. (2026) 'The labour market', in Codini, E. and Ortensi, L.E. (eds.) *31st Italian report on migrations 2025*. Milan: Fondazione ISMU ETS, pp. 47–59. Available at: https://www.ismu.org/wp-content/uploads/2026/05/31st-Italian-Report-on-Migrations-2025.pdf (Accessed: 8 October 2026).

B. International and EU legal instruments

Charter of Fundamental Rights of the European Union (2016) Official Journal of the European Union, C 202, 7.6.2016, pp. 389–405. Available at: https://eur-lex.europa.eu/eli/treaty/char_2016/oj/eng (Accessed: 15 October 2026).

Council of Europe (1950) *Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights)*. Rome, 4 November 1950. Available at: https://www.echr.coe.int/documents/d/echr/convention_ENG (Accessed: 15 October 2026).

Council of Europe (2005) *Council of Europe Convention on Action against Trafficking in Human Beings*. CETS No. 197. Warsaw, 16 May 2005. Available at: https://rm.coe.int/168008371d (Accessed: 15 October 2026).

Directive 2009/52/EC of the European Parliament and of the Council of 18 June 2009 providing for minimum standards on sanctions and measures against employers of illegally staying third-country nationals (2009) Official Journal of the European Union, L 168, 30.6.2009, pp. 24–32. Available at: https://eur-lex.europa.eu/eli/dir/2009/52/oj/eng (Accessed: 15 October 2026).

Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims (2011) Official Journal of the European Union, L 101, 15.4.2011, pp. 1–11. Available at: https://eur-lex.europa.eu/eli/dir/2011/36/oj/eng (Accessed: 15 October 2026).

Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA (2012) Official Journal of the European Union, L 315, 14.11.2012, pp. 57–73. Available at: https://eur-lex.europa.eu/eli/dir/2012/29/oj/eng (Accessed: 15 October 2026).

Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (2019) Official Journal of the European Union, L 305, 26.11.2019, pp. 17–56. Available at: https://eur-lex.europa.eu/eli/dir/2019/1937/oj/eng (Accessed: 15 October 2026).

Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims (2024) Official Journal of the European Union, L, 2024/1712, 24.6.2024. Available at: https://eur-lex.europa.eu/eli/dir/2024/1712/oj/eng (Accessed: 15 October 2026).

Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859 (2024) Official Journal of the European Union, L, 2024/1760, 5.7.2024. Available at: https://eur-lex.europa.eu/eli/dir/2024/1760/oj/eng (Accessed: 15 October 2026).

Directive (EU) 2026/470 of the European Parliament and of the Council of 24 February 2026 amending Directives 2006/43/EC, 2013/34/EU, (EU) 2022/2464 and (EU) 2024/1760 as regards certain corporate sustainability reporting and due diligence requirements (2026) Official Journal of the European Union, L, 2026/470. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202600470 (Accessed: 15 October 2026).

European Commission (2012) *The EU strategy towards the eradication of trafficking in human beings 2012–2016*. COM(2012) 286 final. Brussels. Available at: https://eur-

lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52012DC0286 (Accessed: 15 October 2026).
International Labour Organization (1930) *C029 Forced Labour Convention, 1930 (No. 29)*. Geneva: ILO. NORMLEX. Available at: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312174:NO (Accessed: 15 October 2026).
International Labour Organization (1947) *C081 Labour Inspection Convention, 1947 (No. 81)*. Geneva: ILO. NORMLEX. Available at: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312226 (Accessed: 15 October 2026).
International Labour Organization (1957) *C105 Abolition of Forced Labour Convention, 1957 (No. 105)*. Geneva: ILO. NORMLEX. Available at: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312250:NO (Accessed: 15 October 2026).
International Labour Organization (1958) *C109 Wages, Hours of Work and Manning (Sea) Convention (Revised), 1958 (No. 109)*. Geneva: ILO. NORMLEX. Available at: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:11300:0::NO:11300:P11300_INSTRUMENT_ID:312254:NO (Accessed: 15 October 2026).
International Labour Organization (1969) *C129 Labour Inspection (Agriculture) Convention, 1969 (No. 129)*. Geneva: ILO. NORMLEX. Available at: https://normlex.ilo.org/dyn/nrmlx_fr/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID%2CP12100_LANG_CODE:312274%2Cen (Accessed: 15 October 2026).
International Labour Organization (1975) *C143 Migrant Workers (Supplementary Provisions) Convention, 1975 (No. 143)*. Geneva: ILO. NORMLEX. Available at: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C143 (Accessed: 15 October 2026).
International Labour Organization (1997) *C181 Private Employment Agencies Convention, 1997 (No. 181)*. Geneva: ILO. NORMLEX. Available at: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12201:0::NO:12201:P12201_INSTRUMENT_ID:312326:NO (Accessed: 15 October 2026).
International Labour Organization (1999) *C182 Worst Forms of Child Labour Convention, 1999 (No. 182)*. Geneva: ILO. NORMLEX. Available at: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312327:NO (Accessed: 15 October 2026).
International Labour Organization (2014) *P029 Protocol of 2014 to the Forced Labour Convention, 1930*. Geneva: ILO. NORMLEX. Available at: https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11300:0::NO:11300:P11300_INSTRUMENT_ID:3174672 (Accessed: 15 October 2026).
League of Nations (1926) *Slavery Convention*. Geneva, 25 September 1926. Available at: https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XVIII-3&chapter=18&clang=_en (Accessed: 15 October 2026).
Regulation (EU) 2024/1351 of the European Parliament and of the Council of 14 May 2024 on asylum and migration management, amending Regulations (EU) 2021/1147 and (EU) 2021/1060 and repealing Regulation (EU) No 604/2013 (2024) Official Journal of the European Union, L, 2024/1351, 22.5.2024. Available at: https://eur-lex.europa.eu/eli/reg/2024/1351/oj/eng (Accessed: 15 October 2026).
Regulation (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024 on prohibiting products made with forced labour on the Union market and amending

Directive (EU) 2019/1937 (2024) Official Journal of the European Union, L, 2024/3015, 12.12.2024. Available at: https://eur-lex.europa.eu/eli/reg/2024/3015/oj/eng (Accessed: 15 October 2026).

United Nations (1956) *Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery*. Geneva, 7 September 1956. Available at: https://treaties.un.org/pages/ViewDetailsIII.aspx?src=TREATY&mtdsg_no=XVIII-4&chapter=18&Temp=mtdsg3&clang=_en (Accessed: 15 October 2026).

United Nations (1990) *International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families*. General Assembly resolution 45/158, 18 December 1990. Available at: https://www.ohchr.org/en/instruments-mechanisms/instruments/international-convention-protection-rights-all-migrant-workers (Accessed: 15 October 2026).

United Nations (2000a) *United Nations Convention against Transnational Organized Crime*. General Assembly resolution 55/25, 15 November 2000. Available at: https://www.unodc.org/unodc/en/organized-crime/intro/UNTOC.html (Accessed: 15 October 2026).

United Nations (2000b) *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime*. General Assembly resolution 55/25, annex II, 15 November 2000. Available at: https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XVIII-12-a&chapter=18&clang=_en (Accessed: 15 October 2026).

C. National legislation

Greece

Νόμος 3064/2002 (ΦΕΚ Α' 44): Τροποποιήσεις ποινικού κώδικα: Εμπορία ανθρώπων, πορνογραφία, ασέλγεια κατά ανηλίκων, μαστροπεία, αρωγή θυμάτων κλπ. [Law 3064/2002: Amendments to the Penal Code: trafficking in human beings, pornography, sexual abuse of minors, procuring, victim assistance, etc.] (2002) Greece. Available at: https://nomothesia.0012.syzefxis.gov.gr/index.php/poiniko-dikaio/727-nomos-3064-2002-fek-a-44-tropopoiiseis-poinikoy-kodika-emporia-anthropon-pornografia-aselgeia-kata-anilikon-mastropeia-arogi-thymaton-klp.html (Accessed: 22 January 2026).

Presidential Decree 233/2003 on the protection and assistance of victims of the crimes of Articles 323, 323A, 349, 351 and 351A of the Penal Code (2003) Government Gazette A' 204, 2 September 2003. Greece.

Νόμος 3811/2009 [Law 3811/2009: establishment of the Hellenic Compensation Authority for victims of violent crime] (2009) Greece. Available at: https://www.lawspot.gr/nomothesia/n3811-2009/arthro-1-nomos-3811-2009-elliniki-arhi-apozimiosis-kai/ (Accessed: 8 October 2026).

Νόμος 4052/2012 [Law 4052/2012: harmonisation with Directive 2009/52/EC] (2012) Greece. Available at: https://www.taxheaven.gr/law/4052/2012 (Accessed: 22 January 2026).

Νόμος 4198/2013 [Law 4198/2013: National Referral Mechanism] (2013) Greece. Available at: https://www.lawspot.gr/nomothesia/nomos-4198-2013/ (Accessed: 22 January 2026).

Νόμος 4216/2013 [Law 4216/2013: ratification of the Council of Europe Convention on Action against Trafficking in Human Beings] (2013) Greece. Available at: https://www.e-nomothesia.gr/diethneis-sunthekes/n-4216-2013.html (Accessed: 8 October 2026).

Νόμος 4478/2017 [Law 4478/2017: transposition of Directive 2012/29/EU] (2017) Greece. Available at: https://www.taxheaven.gr/law/4478/2017 (Accessed: 8 October 2026).
Νόμος 4554/2018 [Law 4554/2018: against undeclared employment] (2018) Greece. Available at: https://www.taxheaven.gr/law/4554/2018 (Accessed: 22 January 2026).
Ποινικός Κώδικας (Νόμος 4619/2019) [Penal Code (Law 4619/2019)] (2019) Greece. Available at: https://www.lawspot.gr/nomothesia/poinikos-kodikas-nomos-4619-2019/ (Accessed: 22 January 2026).
Νόμος 4808/2021 [Law 4808/2021: Law for the Protection of Labour] (2021) Greece. Available at: https://www.taxheaven.gr/law/4808/2021 (Accessed: 22 January 2026).
Νόμος 5038/2023 [Law 5038/2023: Migration Code] (2023) Greece. Available at: https://www.taxheaven.gr/law/5038/2023 (Accessed: 22 January 2026). English translation available at: https://sherloc.unodc.org/cld/fr/document/grc/2023/code_of_immigration_law_50382023.html (Accessed: 15 October 2026).
Νόμος 5078/2023 [Law 5078/2023: temporary regularisation scheme for undocumented third-country nationals] (2023) Greece. Available at: https://www.taxheaven.gr/law/5078/2023 (Accessed: 22 January 2026).
Νόμος 5164/2024 [Law 5164/2024: transposition of the Corporate Sustainability Reporting Directive] (2024) Greece. Available at: https://www.taxheaven.gr/law/5164/2024 (Accessed: 22 January 2026).

Italy

Legislative Decree No. 286 of 25 July 1998: Consolidated Act on the provisions governing immigration and the condition of foreign nationals [Testo unico delle disposizioni concernenti la disciplina dell'immigrazione e norme sulla condizione dello straniero] (1998) Gazzetta Ufficiale della Repubblica Italiana, No. 191 (Ordinary Supplement No. 139), 18 August 1998. Available at: https://www.gazzettaufficiale.it/eli/id/1998/08/18/098G0348/sg (Accessed: 15 October 2026).
Law No. 228 of 11 August 2003: Misure contro la tratta di persone [Measures against trafficking in persons] (2003) Italy. Available at: https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2003-08-11;228 (Accessed: 15 October 2026).
Law No. 146 of 16 March 2006: Ratifica ed esecuzione della Convenzione e dei Protocolli delle Nazioni Unite contro il crimine organizzato transnazionale, adottati dall'Assemblea generale il 15 novembre 2000 ed il 31 maggio 2001 [Ratification of the United Nations Convention and Protocols against transnational organized crime] (2006) Italy. Available at: https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2006-03-16;146 (Accessed: 15 October 2026).
Law No. 108 of 2 July 2010: Ratifica ed esecuzione della Convenzione del Consiglio d'Europa sulla lotta contro la tratta di esseri umani, fatta a Varsavia il 16 maggio 2005, nonché norme di adeguamento dell'ordinamento interno [Ratification of the Council of Europe Convention on Action against Trafficking in Human Beings] (2010) Italy. Available at: https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2010-07-02;108 (Accessed: 15 October 2026).
Legislative Decree No. 24 of 4 March 2014: Attuazione della direttiva 2011/36/UE relativa alla prevenzione e repressione della tratta di esseri umani e alla protezione delle vittime [Implementation of Directive 2011/36/EU] (2014) Italy. Available at:

https://www.gazzettaufficiale.it/eli/id/2014/03/13/14G00035/sg (Accessed: 15 October 2026).

Law No. 199 of 29 October 2016: Disposizioni in materia di contrasto ai fenomeni del lavoro nero e dello sfruttamento del lavoro in agricoltura [Provisions to counter undeclared work and labour exploitation in agriculture] (2016) Italy. Available at: https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2016-10-29;199!vig= (Accessed: 15 October 2026).

Law No. 47 of 7 April 2017: Disposizioni in materia di misure di protezione dei minori stranieri non accompagnati [Provisions on protection measures for unaccompanied foreign minors] (2017) Italy. Available at: https://www.gazzettaufficiale.it/eli/id/2017/04/21/17G00062/s (Accessed: 15 October 2026).

Law No. 173 of 18 December 2020: Conversione in legge, con modificazioni, del decreto-legge 21 ottobre 2020, n. 130, recante disposizioni urgenti in materia di immigrazione, protezione internazionale e complementare [Conversion into law of Decree-Law No. 130 of 21 October 2020] (2020) Italy. Available at: https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2020-12-18;173 (Accessed: 15 October 2026).

Decree-Law No. 145 of 11 October 2024: Disposizioni urgenti in materia di ingresso in Italia di lavoratori stranieri, di tutela e assistenza alle vittime di caporalato, di gestione dei flussi migratori e di protezione internazionale, nonché dei relativi procedimenti giurisdizionali [Urgent provisions on the entry of foreign workers, protection of victims of caporalato, migration flows and international protection] (2024) Italy. Available at: https://def.finanze.it/DocTribFrontend/getAttoNormativoDetail.do?id=%7B1AC9B7DF-A693-41FC-B0ED-BF59C773E7CE%7D&primoPiano=true (Accessed: 15 October 2026).

Law No. 187 of 9 December 2024: Conversione in legge, con modificazioni, del decreto-legge 11 ottobre 2024, n. 145 [Conversion into law of Decree-Law No. 145 of 11 October 2024] (2024) Italy. Available at: https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:legge:2024-12-9;187 (Accessed: 15 October 2026).

Legislative Decree No. 115 of 12 June 2026: Implementation of Directive (EU) 2024/1712 of the European Parliament and of the Council of 13 June 2024, amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting victims (2026) Gazzetta Ufficiale della Repubblica Italiana, No. 150, 1 July 2026. Available at: https://www.normattiva.it/uri-res/N2Ls?urn:nir:stato:decreto.legislativo:2026;115.000 (Accessed: 15 October 2026).

Bulgaria

Combating Trafficking in Human Beings Act (2003) State Gazette No. 46/2003. Bulgaria. Available at: https://www.mlsp.government.bg/uploads/1/blgarsko-zakonodatelstvo/en/combating-trafficking-in-human-beings-act.pdf (Accessed: 15 October 2026).

National Assembly of the Republic of Bulgaria (1991) *Constitution of the Republic of Bulgaria*. Available at: https://www.parliament.bg/en/const (Accessed: 15 October 2026).

Criminal Code of the Republic of Bulgaria (1968) State Gazette No. 26/1968, as amended. Available at: https://www.mlsp.government.bg/uploads/1/blgarsko-zakonodatelstvo/en/criminal-code.pdf (Accessed: 15 October 2026).

UNODC SHERLOC (n.d.) *Criminal Code of the Republic of Bulgaria, Articles 159a–159d*. Available at: https://sherloc.unodc.org/cld/en/legislation/bgr/criminal_code/special_part_-_chapter_two/article_159a159d/article_159a159d.html (Accessed: 15 October 2026).

Foreigners in the Republic of Bulgaria Act (1998) Bulgaria. Available at: https://www.mig.government.bg/wp-content/uploads/2022/11/foreigners_in_the_republic_of_bulgaria_act.pdf (Accessed: 15 October 2026).

Health and Safety at Work Act (1997) State Gazette No. 124, 23 December 1997, as amended. Bulgaria. Available at: https://www.mlsp.government.bg/uploads/37/politiki/trud/zakonodatelstvo/eng/health-and-safety-at-work-act.pdf (Accessed: 15 October 2026).

Labour Code of the Republic of Bulgaria (1986) Available at: https://www.mlsp.government.bg/uploads/37/politiki/trud/zakonodatelstvo/eng/labour-code.pdf (Accessed: 15 October 2026).

Poland

Code of Criminal Procedure of Poland (Act of 6 June 1997) (1997) UNODC SHERLOC. Available at: https://sherloc.unodc.org/cld/uploads/res/document/pol/1997/the_code_of_criminal_procedure_html/Code_of_Criminal_Procedure_of_Poland_of_1997.pdf (Accessed: 15 October 2026).

Executive Penal Code of Poland (Act of 6 June 1997) (1997) Internetowy System Aktów Prawnych (ISAP), Sejm of the Republic of Poland. Available at: https://isap.sejm.gov.pl/isap.nsf/DocDetails.xsp?id=WDU19970900557 (Accessed: 15 October 2026).

Act of 28 October 2002 on the Liability of Collective Entities for Prohibited Acts Punishable by a Penalty (excerpt) (2002) UNODC SHERLOC. Available at: https://sherloc.unodc.org/cld/uploads/res/document/pol/2004/act_of_28_october_2002_excerpt_html/Poland_Law_on_the_Liability_of_Collective_Subjects_for_Acts_Prohibited_under_Punishment_2002_Excerpt.pdf (Accessed: 15 October 2026).

Act of 13 June 2003 on Granting Protection to Foreigners within the Territory of the Republic of Poland (2003) Refworld. Available at: https://www.refworld.org/legal/legislation/natlegbod/2003/123490 (Accessed: 15 October 2026).

Act of 24 April 2003 on Public Benefit Activity and Volunteerism (2003) Poland. Available at: https://www.icnl.org/post/analysis/poland-adopts-new-law-on-public-benefit-activity-and-volunteerism (Accessed: 15 October 2026).

Act of 12 March 2004 on Social Assistance (2004) SPLASH database. Available at: https://splash-db.eu/?tx_perfar_policydocument%5baction%5d=show&tx_perfar_policydocument%5bcontroller%5d=Policydocument&tx_perfar_policydocument%5bpolicydocument%5d=1677&cHash=3f103301e4c9648aa2d3dc6effe82fa3 (Accessed: 15 October 2026).

Act of 7 July 2005 on State Compensation for Victims of Certain Prohibited Acts (2005) Poland. Available at: https://eur-lex.europa.eu/EN/legal-content/summary/compensation-for-victims-of-crime-in-other-eu-countries.html (Accessed: 15 October 2026).

Act of 14 July 2006 on the Entry into the Territory of the Republic of Poland, Stay and Departure from this Territory of Citizens of the European Union Member States and Members of their Families (2006) Office for Foreigners (Poland). Available at: https://www.mos.cudzoziemcy.gov.pl/en/categories-information/visas-movement-free/rules-for-entry-and-short-term-stay/ (Accessed: 15 October 2026).

Act of 12 December 2013 on Foreigners (2013) Refworld. Available at: https://www.refworld.org/legal/legislation/natlegbod/2013/103431 (Accessed: 15 October 2026).

Act of 28 November 2014 on the Protection and Assistance for the Injured Party and Witness (2014) Poland. Available at: https://e-justice.europa.eu/topics/your-rights/victims-crime/victims-rights-country/1-my-rights-victim-crime/pl_en (Accessed: 15 October 2026).

Act of 5 August 2015 on Free Legal Assistance, Free Citizen's Advice and Legal Education (2015) Poland. Available at: https://api.sejm.gov.pl/eli/acts/DU/2015/1255/text.html (Accessed: 15 October 2026).

Act of 14 December 2018 on the Protection of Personal Data Processed in Connection with the Prevention and Combating of Crime (2018) Poland. Available at: https://eur-lex.europa.eu/EN/legal-content/summary/protecting-personal-data-that-is-used-by-police-and-criminal-justice-authorities-from-2018.html (Accessed: 15 October 2026).

Act of 12 March 2022 on Assistance to Ukrainian Citizens in Connection with the Armed Conflict on the Territory of that State (2022) Refworld. Available at: https://www.refworld.org/legal/legislation/natlegbod/2022/147320 (Accessed: 15 October 2026).

Act of 14 June 2024 on the Protection of Whistleblowers [Ustawa z dnia 14 czerwca 2024 r. o ochronie sygnalistów] (2024) Dziennik Ustaw 2024, item 928. Available at: https://eli.gov.pl/api/acts/DU/2024/928/text.pdf (Accessed: 15 October 2026).

Prime Minister of Poland (2025) *Zarządzenie Nr 52 Prezesa Rady Ministrów z dnia 30 września 2025 r. w sprawie Zespołu do spraw wsparcia zrównoważonego rozwoju przedsiębiorstw* [Order No. 52 of 30 September 2025 on the Team for Supporting the Sustainable Development of Enterprises]. Monitor Polski 2025, item 1033. Available at: https://www.gov.pl/attachment/2a74667a-e418-4105-9cbd-4da122931c79 (Accessed: 15 October 2026).

D. National policy documents, programmes and projects

Azienda Sanitaria Provinciale di Palermo (ASP Palermo) (n.d.) *Progetto Maddalena: Casa dei Giovani*. Available at: https://www.asppalermo.org/wp-content/uploads/2024/08/CASA-DEI-GIOVANI-1.pdf (Accessed: 15 October 2026).

CESIE ETS (n.d.a) *ASIT: Adequate Support measures and Improved capacities in countering THB* (ISF, 2023–2025). Available at: https://cesie.org/en/project/asit/ (Accessed: 15 October 2026).

CESIE ETS (n.d.b) *HOST: Tackling Human Trafficking in the Hospitality sector* (AMIF, 2025–2027). Available at: https://cesie.org/en/project/host/ (Accessed: 15 October 2026).

CESIE ETS (n.d.c) *SAFE HUT: Holding safe spaces for women and girls' empowerment* (AMIF, 2023–2025). Available at: https://cesie.org/en/project/safe-hut/ (Accessed: 15 October 2026).

CESIE ETS (n.d.d) *SafeBorders: Strengthening Judicial expertise and Frontline support to combat Child Trafficking* (ISF, 2025–2026). Available at: https://cesie.org/en/project/safeborders/ (Accessed: 15 October 2026).

Council of Ministers (Poland) (2024) *Odzyskać kontrolę. Zapewnić bezpieczeństwo. Kompleksowa i odpowiedzialna strategia migracyjna Polski na lata 2025–2030* [Regain control. Ensure security. Comprehensive and responsible migration strategy of Poland for 2025–2030]. Available at: https://migrant.poznan.uw.gov.pl/en/system/files/pliki/strategia_migracyjna_polski_2025-2030.pdf (Accessed: 15 October 2026).

Dipartimento per le Pari Opportunità, Presidenza del Consiglio dei Ministri (2022) *Piano nazionale d'azione contro la tratta e il grave sfruttamento degli esseri umani 2022–2025* [National action plan against trafficking and serious exploitation of human beings 2022–2025]. Available at: https://www.pariopportunita.gov.it/it/politiche-e-attivita/tratta-degli-esseri-umani-e-grave-sfruttamento/piano-nazionale-d-azione-contro-la-tratta-e-il-grave-sfruttamento-degli-esseri-umani-2022-2025 (Accessed: 15 October 2026). English version: https://www.pariopportunita.gov.it/media/2428/piano-anti-tratta-2022-2025_eng.pdf (Accessed: 15 October 2026).

European Labour Authority (2022) *National action plan to tackle labour exploitation, unlawful recruitment and forced labour in agriculture (Italy)*. Available at: https://www.ela.europa.eu/sites/default/files/2022-01/GP-fiche_IT_National-action-plan.2022_EN.pdf (Accessed: 15 October 2026).

Ministerstwo Spraw Wewnętrznych i Administracji (2024) *Krajowy Mechanizm Referencyjny* [National Referral Mechanism]. Portal dedicated to the fight against human trafficking. Available at: https://www.gov.pl/web/handel-ludzmi/krajowy-mechanizm-referencyjny (Accessed: 15 October 2026).

Ministero del Lavoro e delle Politiche Sociali (n.d.a) *National Plan against Labour Exploitation in Agriculture (2020–2022)* [Piano triennale]. Available at: https://lavoro.gov.it/temi-e-priorita/immigrazione/focus-on/tavolo-caporalato/pagine/piano-triennale-2020-2022 (Accessed: 15 October 2026).

Ministero del Lavoro e delle Politiche Sociali (n.d.b) *Su.Pr.Eme.2: Per il contrasto e il superamento delle forme di grave sfruttamento lavorativo, caporalato e situazioni di grave marginalità e vulnerabilità* (FAMI 2021–2027; PN Inclusione FSE+ 2021–2027). Portale Integrazione Migranti. Available at: https://integrazionemigranti.gov.it/it-it/Dettaglio-progetto/id/62/SuPrEme2 (Accessed: 15 October 2026).

Ministry of Labour and Social Policies (Italy) (2021) *Linee guida nazionali in materia di identificazione, protezione e assistenza delle vittime di sfruttamento lavorativo in agricoltura* [National guidelines on the identification, protection and assistance of victims of labour exploitation in agriculture]. Available at: https://www.inapp.gov.it/comunicazione/notizie/linee-guida-per-la-protezione-e-lassistenza-alle-vittime-di-sfruttamento-lavorativo-in-agricoltura (Accessed: 15 October 2026).

Piano nazionale per la lotta al lavoro sommerso per il triennio 2023–2025 [National plan to combat undeclared work 2023–2025] (n.d.) Available at: https://www.certifico.com/sicurezza-lavoro/news-sicurezza/piano-nazionale-per-la-lotta-al-lavoro-sommerso-per-il-triennio-2023-2025 (Accessed: 15 October 2026).

Presidenza del Consiglio dei Ministri (n.d.) *Piano nazionale di prevenzione e contrasto dell'abuso e dello sfruttamento sessuale dei minori 2022–2023* [National plan to prevent and combat the sexual abuse and exploitation of minors 2022–2023]. Available at: https://famiglia.governo.it/media/2847/piano-nazionale-di-prevenzione-e-contrasto-dellabuso-e-dello-sfruttamento-sessuale-dei-minori.pdf (Accessed: 15 October 2026).

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