



Modernizing National Action Plans

to strengthen
States'
anti-trafficking
efforts

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Introduction

Effectively combating trafficking in human beings (THB) requires a strategic, co-ordinated and well-resourced national response, utilizing a whole-of-society approach that can protect victims, prosecute traffickers and prevent exploitation. **National Action Plans (NAPs)** are fundamental to the successful delivery of such a response because they serve as the primary planning and mid-term strategy documents for States' efforts to combat trafficking as well as the means of evaluating the efficacy and impact of those efforts.

Recognizing the importance of NAPs within national anti-trafficking systems, the Office of the OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings (OSR/CTHB) analysed the NAPs that are currently in use within the OSCE region to examine their structure and thematic priorities against persistent challenges and emerging trafficking trends. This analysis showed that NAPs across the OSCE region contain many of the same core building blocks, such as a framework built around the 3/4Ps paradigm of Prevention, Prosecution, Protection and Partnerships. At the same time, the analysis found that emerging crucial areas of counter-trafficking work, such as combating technology-facilitated trafficking, are broadly unaccounted for within current NAPs. These deficiencies undermine effective national responses to growing areas of concern.

To help OSCE participating States better harness the potential of NAPs to deliver on the anti-trafficking agenda, this publication briefly outlines current approaches to NAPs in the OSCE region, highlighting common structural and thematic gaps, and provides guidance on how States can modernize their NAPs to better respond to the current and evolving nature of human trafficking.



National Action Plans serve as the primary planning and mid-term strategy documents for States' efforts to combat trafficking.

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THE NATIONAL ACTION PLAN TO COMBAT HUMAN TRAFFICKING

Publications of the Ministry of Justice | Memorandums and statements | 2021:24

DECEMBER

Finland fights human trafficking

Action Plan against Trafficking in Human Beings

PLAN ESTRATÉGICO NACIONAL CONTRA LA TRATA DE PERSONAS Y LA EXPLOTACIÓN DE RECURSOS HUMANOS

Government of Canada | Gouvernement du Canada | Canada

STRATEGY TO COMBAT HUMAN TRAFFICKING

Examples of National Action Plans across the OSCE region.

1

Current approaches to National Action Plans

Methodology

The OSR/CTHB analysed the currently active NAPs within the OSCE region with regard to how they structure programmatic activities and what aspects of the anti-trafficking response they include. To achieve this, starting in 2021, the OSR/CTHB collected and examined 41 NAPs from 39 OSCE participating States¹, and subsequently reviewed 11 NAPs in 2022, as new plans were adopted and others expired. From this analysis, distinct trends emerged in NAP structure and thematic priorities, as did a diversity of approaches regarding mechanisms for governmental accountability, transparency, and responsibility. The following sections of Chapter 1 elaborate on these findings.

Structures and Frameworks

NAPs should be clear and actionable, providing direct guidance not only on what activities are prioritized within the national response, but also on who within government structures is responsible for delivering those activities and on how and when they will be implemented and funded. They should also embrace the iterative process of anti-trafficking efforts, seeking to evaluate and improve on completed activities.



Organization

Most NAPs within OSCE participating States articulate policy objectives through a 3Ps structure of prevention, protection, and prosecution, following the structure of anti-trafficking efforts set out in the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, commonly referred to as the Palermo Protocol. Additionally, 18 participating States also included a fourth 'P' of partnership into their NAPs, indicating wide use of a cross-sectoral approach to combat trafficking, and embracing their OSCE commitments.

90% of NAPs also include a responsible agency for each activity, which contributes to clarity in not only 'what' is to be done, but 'who' is accountable for implementation. These features demonstrate that, by and large, NAPs within the OSCE region are clearly structured and able to organize programmatic activities across government ministries and departments.



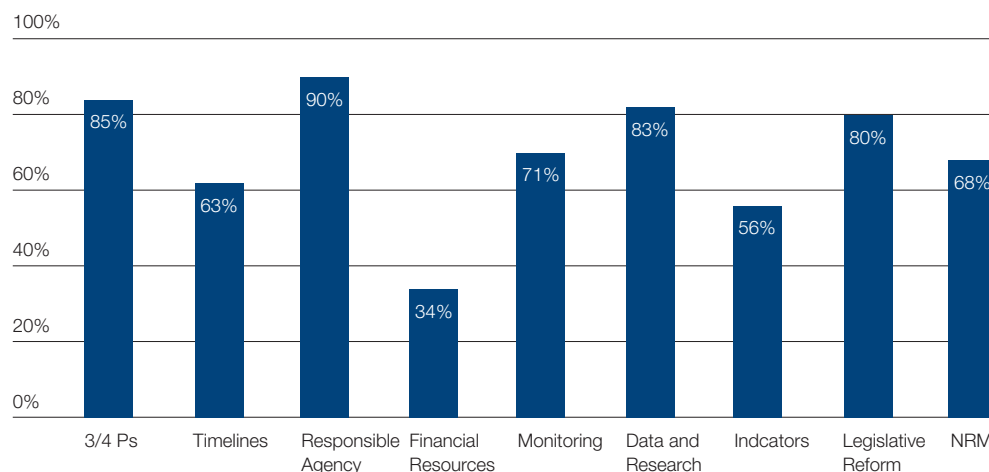
Timelines and budgets

Since NAPs are typically multi-year initiatives, timelines are also a fundamental component for indicating when activities will take place and how aspects of the NAP build over time. Roughly two-thirds of active NAPs include a timeline for their activities, although only a handful included specific indicators of the desirable outcomes for each activity within a particular year; most instead utilize broader deadlines spread out over the course of one or more years.

There is, however, a strong correlation between NAPs with specified budgets and those with timelines for each activity, presumably because transparently spending of an allocated budget requires clear timelines, progress indicators and responsible oversight agencies.

Only 34% of active NAPs contain resourcing for planned activities. While most budgets in NAPs specified sources of funding, fewer indicated the exact amount of funds per activity; only a handful of NAPs offer insight into whether this budget would be stable and recurrent. Most NAPs do not specify an allotted budget for individual activities. Furthermore, although some NAPs indicate a responsible funding agency, it is not certain whether there is dedicated and recurrent funding. Thus, consistent and sustainable resourcing remains an open question for the majority of NAPs across the OSCE region and a likely barrier to effective implementation.

Structural components of active NAPs in the OSCE region in percentage (%)



Data collection and research

As the platform for national anti-trafficking activities, NAPs can serve as a key tool in collecting quantitative and qualitative data in order to evaluate and improve such activities. This potential is well illustrated by the active NAPs in the OSCE region: 83% contain activities pertaining to data collection and analysis, yet only half of those included the budgeting of specific activities in this regard.

Moreover, while quantitative data gathering is often included in NAPs, only 10 NAPs plan for qualitative research, indicating a potential gap in understanding developing trends.

There is a strong correlation between States that collect data and States that measure implementation of the NAP: all but one participating State with progress indicators also stated the objective of collecting data.

NAPs can also serve as a method of communicating data and providing insight into the national anti-trafficking situation and context. Some NAPs, such as Spain’s 2021-2023 National Action Plan Against Human Trafficking and Exploitation,² contain detailed narratives on anti-trafficking trends within the country, utilizing data collected on, for example, victim profiles, changes in forms of exploitation and even the means used to exploit victims. The presentation of such data and research within NAPs is somewhat common within the OSCE region, and represents a good practice in helping to ground NAPs within the national context.



Monitoring and evaluation

NAPs are only as strong as governments’ implementation of the planned activities, a fact that underscores the importance of incorporating monitoring mechanisms in the structure of NAPs to ensure that the foreseen activities are implemented and evaluated. 71% of NAPs contain methods and mechanisms for monitoring their implementation, noticeably more than the 56% that include indicators for activities to monitor their progress. This potentially points to a gap between the desire for States to monitor and assess implementation of their NAP, and having the structures to actually conduct that monitoring systematically.

Systematic monitoring also lends itself to better evaluation, a process that is fundamental for NAP development. Yet, evaluating the impact of NAPs after they are completed is a relatively infrequent process: while some OSCE participating States have published official evaluations of past NAPs, this activity has yet to be widely incorporated into NAPs across the OSCE region, a circumstance that hampers the iterative development of new NAPs.

Thematic priorities

While the structure of NAPs supports the overall implementation of the national anti-trafficking response, the thematic areas covered within NAPs dictate which areas of that response receive the most attention and resources. The thematic coverage within NAPs also helps determine how States are responding to the evolving nature of the crime, adjusting their activities in the areas of protection, prosecution and prevention.

A common aspect of NAPs across the OSCE is the inclusion of work on legislation, either in the form of passing new laws and policies pertaining to THB or adjusting existing sections of the penal code and code of criminal procedure. Such activities are present in 80% of NAPs currently active within OSCE participating States, demonstrating a strong awareness of the value NAPs represent in regard to channelling political will and promoting legislative priorities.

Certain thematic topics frequently see attention in NAPs, although often from a limited perspective. For example, it is common for NAPs in the OSCE region to include activities pertaining to national referral mechanisms (NRMs) within the context of victim identification and protection. Activities related to NRMs are present in roughly two-thirds of NAPs, though often only in the context of establishing an NRM, funding its continuation or monitoring its work. Noticeably, NAPs within the OSCE region often do not include activities aimed at improving the functioning of the NRM.

With regard to trends on other specific thematic topics, longstanding areas of attention such as trafficking of children, trafficking for labour exploitation, and capacity building of law enforcement, receive the greatest attention within NAPs, while newly developed and evolving areas of anti-trafficking work, such as financial investigations, are less commonly included.

Common areas of focus: child trafficking, capacity building and forced labour

The OSR/CTHB found that almost all NAPs included provisions on child trafficking and capacity building, particularly those involving law enforcement actors and the judiciary. Similarly, improving the work of labour inspectorates to identify victims of trafficking for the purpose of forced labour, such as seen in Example 1, is also nearly omnipresent within currently active NAPs.



Example 1 Poland 2022-2024 National Action Plan

IV.4 Development of guidelines for labour inspectors on the methodology of conducting control activities in cases where there is a suspicion of human trafficking, in particular forced labour, and implement them – continuation of works

The task will be implemented by: ad hoc working group for the development of guidelines for labour inspectors on the methodology of carrying out inspection activities in cases where there is a suspicion of human trafficking, in particular forced labour.

Timeframe: 2022-2024

Indicator: development and implementation of guidelines

Capacity building, in the form of training, awareness raising and education is the most dominant area of programmatic work within NAPs (included in 93% of NAPs), and represents the bulk of State attention and resources. Most notably included in the area of ‘prosecution’, capacity building activities in NAPs are also commonly directed at areas of protection, particularly with regard to improving the ability of non-law enforcement actors to identify victims of trafficking.

Child victims of trafficking were the victim profile most commonly included within NAPs, and most NAPs in the OSCE region include a number of activities in the areas of prevention - including efforts targeting groups of at-risk youth - and protection that are specifically aimed at addressing the causes and impacts of child trafficking. This emphasis on child trafficking is well aligned with the steady increase in identified child victims of trafficking, which now account for 35% of all identified victims.³

Common gaps: gender and technology

Trafficking is a highly gendered crime, with women and girls and men and boys impacted by different forms of exploitation in different ways. As outlined by the OSCE publication *Applying Gender-Sensitive Approaches in Combating Trafficking in Human Beings*,⁴ these dynamics influence the identification of victims,⁵ as well as the services and support victims require and receive.⁶ Given the importance of utilizing gender-sensitive approaches in anti-trafficking efforts, it is noted that currently over two-thirds of NAPs within the OSCE region (68%), include at least one activity that accounts in some respect for the gender dimensions of traf-

ficking. These data demonstrate that some work is being done within a majority of OSCE participating States to account for gendered aspects of the crime. However, much of this work is oriented toward victims who fit the “ideal victim” profile, such as women and girls in sexual exploitation or migrant males in terms of trafficking for the purpose of forced labour; very few NAPs incorporate a more nuanced perspective of gender into their activities and frameworks for combating THB.

Attention to technology-facilitated THB and online exploitation demonstrates a similar pattern: there is a fairly widespread recognition of the issue within NAPs but limited thematic depth in relation to programmatic activity. 59% of NAPs contain at least one action that pertains to technology-facilitated trafficking, indicating high levels of awareness of online exploitation; however, the majority of these efforts are geared toward awareness raising for children and youth on online risks and otherwise limited in scope.

The broader, structural challenges associated with combating online exploitation, such as developing appropriate policy responses to the crime and increasing the capacity of law enforcement to identify and investigate instances of human trafficking online, are consistently absent from current NAPs. Likewise, the potential positive uses of technology to combat trafficking are also seldom referenced.

Other common thematic gaps in NAPs

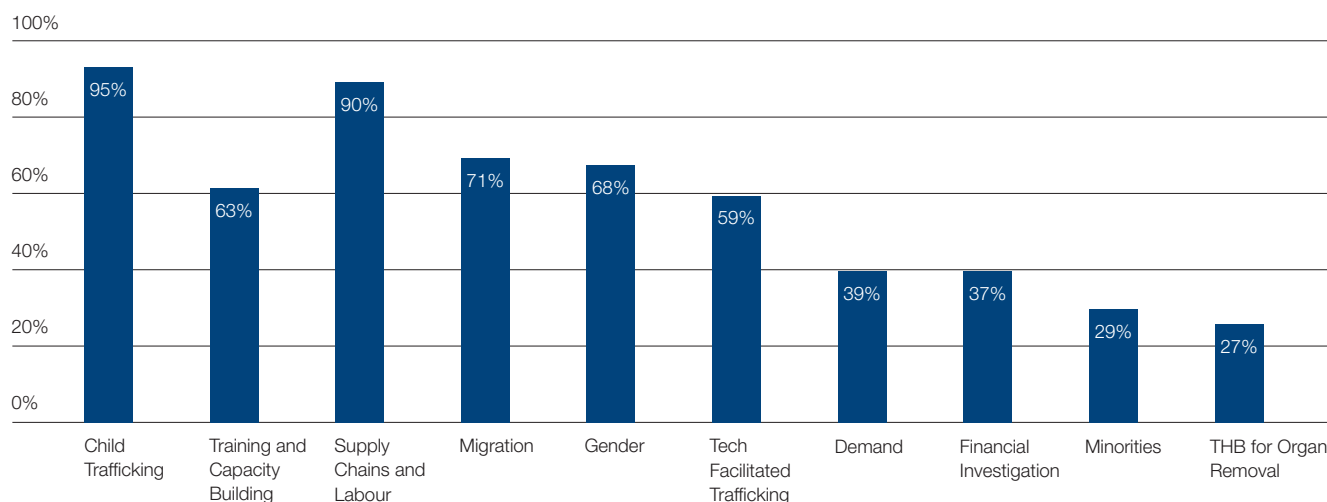
As seen in the graph below, other emerging areas of anti-trafficking work, such as efforts to discourage the demand that fosters sexual exploitation and action to promote financial investigations into trafficking proceeds, are still infrequently reflected within NAPs.

Currently, only 16 NAPs include activities on demand related to THB for sexual exploitation, meaning that near two-thirds of OSCE participating States with a NAP do not include attention to demand even though discouraging demand is an international legal obligation. Moreover, of those that do, attention to demand is often limited to low intensity awareness campaigns, with more proactive forms of prevention, including deterrence and disruption initiatives, generally not included in NAPs.⁷

Financial investigations are also consistently omitted with just 15 NAPs addressing the topic. Rather surprisingly, the absence of work on financial investigations include participating States where anti-money laundering frameworks are relatively well developed. For example, financial investigations are included in only seven NAPs from European Union Member States, despite Directive 2018/1673 of the European Parliament and of the Council (known commonly as the 6th Anti-Money Laundering Directive) specifically includes provisions on human trafficking.⁸

Tackling labour exploitation within supply chains also receives low levels of attention within existing action plans. While efforts to improve responses to THB for the purpose of forced labour are near omnipresent within NAPs, prevention activities pertaining to combating THB within supply chains, both public and private, are more limited, as only 14 NAPs target procurement processes as a means to address the demand that fosters trafficking for forced labour.

Themes included within active NAPs in the OSCE region in percentage (%)



2

Recommendations for modernizing and strengthening National Action Plans

In light of the analysis above, opportunities exist to modernize action plans to make them more responsive to the changing nature of THB and reactive to programmatic successes and challenges. Updated NAPs can create clearer frameworks to monitor and evaluate national anti-trafficking activities, and improve the ability of actors to protect victims, prosecute perpetrators and prevent the crime from taking place.

Success requires adjusting the organizational architecture behind NAPs, the processes used to create and implement them, and the aspects of THB they target for State action.

Enhancing NAP Structures and Frameworks

As outlined, the majority of NAPs in use by OSCE participating States contain features that represent best practices, such as clear timelines for activities, delineating responsible agencies, and providing means of verification and data collection. However, while those planning tools are in widespread use, gaps still exist across the majority of NAPs currently in use within the OSCE region. To enhance the structures and frameworks of NAPs, States should: employ multi-stakeholder approach in designing NAPs, allocate sufficient resources to their implementation; institute a mechanism of evaluation to ensure efficacy of envisaged actions; and promote research to keep the anti-trafficking response in line with the needs on the ground. The following sections delve into each of these areas in more detail.

Harness a multi-stakeholder approach to developing and implementing NAPs

The success or failure of NAPs not only depends on the effectiveness of their structure and the alignment of their thematic priorities with national anti-trafficking needs, but also on their ability to solicit and cultivate buy-in, support and engagement from a variety of stakeholders – inside and outside of government. Such support is critical to ensure financial and political backing for anti-trafficking activities, as well as the overall prioritization of counter-trafficking efforts with the work plans of different ministries and agencies.

To properly achieve this support for NAPs, and generate the necessary political will and momentum to develop and implement new activities, OSCE participating States should first and foremost utilize multi-agency anti-trafficking Task Forces, commissions or equivalent bodies responsible for comprehensive national anti-trafficking efforts in the devel-

opment and authorization of NAPs, in line with the 2003 OSCE Action Plan.⁹ Employing multi-stakeholder groups that incorporate actors from law enforcement, civil society and national ministries to develop, evaluate and implement a NAP helps ensure that all actors engaged in work across the anti-trafficking ecosystem have input to the NAP, facilitating their own alignment with its priorities and promoting ownership. Early involvement in this process also gives NAPs an additional feedback loop into current challenges and opportunities in the fight against human trafficking, particularly given the presence of civil society organizations (CSOs) in such multi-stakeholder settings. As noted by *The Critical Role of Civil Society in Combating Trafficking in Human Beings*¹⁰, CSOs play an important role across the “4P” paradigm and often provide valuable information to national authorities to identify and understand trafficking trends.

Harnessing this information, and the power of collective responsibility embedded within anti-trafficking Task Forces, commissions or equivalent bodies enables NAPs to leverage political will into policy action.

Allocate sufficient resources

Combating trafficking in human beings remains an under-resourced activity in all OSCE participating States, and NAPs can play a central role in securing, clarifying and channeling the resources needed to anti-trafficking stakeholders. By outlining the financial resources available to conduct activities, they enable the planning and implementation of non-routine activities and help ensure that planned initiatives actually take place. Specified funding can enable meaningful implementation of government’s strategic objectives by ensuring that enumerated activities are actually conducted during the lifespan of the plan. Simply put, budgets indicate governmental action and commitment, and NAP implementation is only possible with predictable, adequate, and secured funding.

In circumstances where NAPs do not allocate resources, anti-trafficking efforts are left to be funded by the general budgets of different agencies and ministries, increasing their susceptibility to cuts, de-prioritization, or lack of financial resources. This is why it is important to enumerate the funding for activities even if it is assumed that the activity will be paid for from regular allocations from the State budget, because listing the amount of funding allocated can help insulate anti-trafficking activities from competing priorities during implementation. Finally, the formulation of adequate financing should include monitoring mechanisms that ensure the delivery of financed activities.

Similarly, when enumerated funds are not sufficient to cover the extent of programming envisioned within the NAP, calling attention to this issue and producing concrete estimates of required additional resources, financial or otherwise, can help foster greater support for increased funding. Example 3 from the 2021-2023 Albanian National Action Plan for the Fight Against Human Trafficking provides an example of what such clarity could look like.¹² The far right column indicates the funding gap for each policy goal contained within the plan, providing a concrete figure for the full amount that would be required. This approach clarifies the additional level of support needed for policy makers.

As can be seen in the example below from Finland’s NAP for 2021-2023¹¹, clarifying the amount of financing and the responsible agency for providing that funding offers additional certainty around the activity, as does clarifying the financial year for the work. Both elements help ensure that the activity has the resources necessary to take place, which in turn makes the activity’s completion more likely.

While such detailed funding information does not necessarily guarantee financial resources, it does make it easier for decision makers to understand the benefits of providing additional funding for THB activities, a situation that can only help anti-trafficking efforts compete for access to limited resources.



Example 2
Provision of resources within Finnish NAP

48. Examine why the provision of the Criminal Code concerning abuse of a victim of sexual trade is only seldom applied. The examination will look into the reasons for the low numbers of reports filed with the police, pre-trial investigations, considerations of charges and verdicts.

Responsibility: Ministry of Justice, Government anti-trafficking co-ordination.
Timeframe: 2020–2021
Funding: EUR 30,000 Ministry of Justice



Example 3
Multi-year funding from Albanian 2021-2023 NAP

The purpose of the policies	Nature/ Typology of the costs	Total Cost 2021-2023	Planned Costs Budget and Donors	Financial Gap 2021-2023
Purpose of Policy 1: “Reducing the threat and impact of organized crime and serious crimes”	Current	50,677,784	47,478,584	3,199,200
	Capital	0		
Purpose of Policy II: “Protection of citizens, institutions and the economy”	Current	138,302,992	132,507,000	8,670,992
	Capital	5,750,000	2,875,000	
Purpose of Policy II “Increasing the preventive measures against the threats of organized crime and serious crimes”	Current	214,946,644	182,012,644	35,809,000
	Capital	2,875,000	0	
Total (Albanian Lek)		412,552,420	364,873,228	47,679,192
Total (Euro) Rate exchange: 1 EUR -> 125 ALB lek		3,300,419	2,918,986	381,434

Measure outcomes and evaluating impact

For NAPs to be at their most effective, they must embody an iterative process, whereby the successes and challenges of previous plans serve as inputs into the development of subsequent NAPs. To accomplish this, the outcomes of activities contained within the action plan must be measured and thoroughly evaluated for impact. The institutional framework for evaluating and assessing the impact of a NAP ensures that future programmatic work not only becomes more efficient, but also reflects new areas of need. Without such processes in place, NAPs are at risk of becoming repetitive, with anti-trafficking efforts no longer advancing or reflecting areas of greatest need.

To institute a system of measurement and evaluation, it is important to first create a structure within the NAP itself that allows for the outcomes of activities to be assessed. Example 4 from the NAP of Georgia demonstrates how this can be achieved through a detailed system of indicators for each objective and activity, and the means by which that indicator will be identified - a clear framework that allows for an objec-

tive analysis of the activity without the need for specialized knowledge. It is important, though, for such indicators to not be merely quantitative, as data alone does not demonstrate impact. A mixture of qualitative and quantitative indicators can help assess the quality of the outputs as well as the quantity; baseline and target figures can help show the rate of change over the lifetime of the NAP.

Compiling this information, either during the lifespan of the NAP or upon its completion, generates the information necessary to then evaluate the NAP against its objectives, and assess its work against current programmatic needs across the areas of protection, prevention, prosecution and partnership. Such an evaluation should be rigorous and include suggestions for how to improve areas that fell short of their objectives. Example 5 from the evaluation of Switzerland's 2017-2020 NAP, demonstrates what this could look like, incorporating an overview of what the activity entailed within the NAP as well as an evaluation of its impact on counter-trafficking efforts.



Example 4
Indicators and means of verification from Georgian NAP

Objective 1.2		Improvement of mechanisms for detection of THB crime and conducting effective criminal prosecution							
Outcome indicator	Percentage of cases out of the number of investigations of THB crime, on which criminal persecution was initiated		Baseline Value	Target Value		Source of Verification			
				Midterm target value	Target value				
		Year	2019	2021	2022				
Activity	Output indicator	Source of verification	Responsible agency	Partner agency	Deadline	Budget and finance source			Comments
						State Budget	Other	Shortage	
1.2.5 Cooperation between the Labor Inspection Service and the Central Criminal Police Department for the purposes of effective identification and referral of the signs of labor exploitation and ensuring timely response to them. Expanding the scope of victim identification bodies, while reviewing the list of indicators of becoming a victim and monitoring data provision	1.2.5.1 Number of institutions inspected by the Labor Inspection Service (min. 300)	Details of the order of the Minister of Labor	Labor Inspection Service	Ministry of Internal Affairs	Quarter IV, 2022	Administrative resource			
	1.2.5.2 Number of investigations commenced on the labor exploitation facts referred by the Labor Inspection Service	Investigation statistics							



Example 5
Assessment of activities from 2017-2020 Swiss NAP

<p>11. Statistics II Adaptation of the victim support statistics by also collecting statistical data of the specialized victim support by NGOs on the care for the victims of human trafficking.</p>	<p>Federal Office for statistics (FSO)</p>	<p>For 2018, there is statistical information on the victims who received advice from an NGO and whose statistical data was made available to the FSO. The current victim support statistics only include the data that is recorded by the recognized victim support centers in accordance with the Victim Assistance Act and reported to the FSO. Those victims who go directly to the NGO are not recorded. It is also often unclear whether those victims who are looked after and advised by the specialized NGOs on behalf of the cantonal victim support offices are statistically excluded from the information provided by the victim support office. No personal details are recorded, only statistical information on the counselling case and rudimentary socio-demographic information on the victim. The recording must take place with the help of the existing survey instruments.</p> <p>GRETA recommendation (2015): 8</p>	<p>In 2020, the FSO carried out a consultation with all NGOs according to a list provided by fedpol. The aim of this consultation was to assess whether the NGOs can provide the FSO with data based on the official FSO questionnaire on victim support statistics.</p> <p>Few NGOs actually answered this questionnaire. This means that in 2021 the FSO still could not with certainty produce an official list of NGOs in Switzerland that care for victims of human trafficking. The FSO is therefore of the opinion that the prerequisites for a proper integration of these organizations are not given at national level in order to guarantee a uniform quality of data collection and to meet the requirements of good statistical practice.</p> <p>Evaluation of the implementation The data of the NGOs, which offer specialized care for victims of human trafficking, are still not included in the national victim support statistics and it is also not foreseeable if and when this will take place. This means that this action is not fulfilled and it has no effect.</p>
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Promote research into THB

Increasing research as well as the collection and utilization of quantitative and qualitative data about THB trends and patterns gives States greater potential to adapt NAPs to the ever-changing nature of trafficking in human beings.

Trafficking continues to evolve as a crime - recent years have seen substantive shifts in the modus operandi of traffickers and in the profile of victims. For example, notable trends include an increase in online recruitment, advertisement and exploitation of victims, a steep rise in the number of identified child victims of trafficking, and the significant increase in cases of trafficking for exploitation in criminal activities; each of these requires further analysis and understanding. However, only 10 current NAPs include efforts to develop qualitative research into emerging trafficking trends. This risks creating a gap in the understanding of the crime and its specificities within unique national contexts, which in turn limits the ability of NAPs to direct State resources and policy attention to necessary solutions.

To overcome this barrier, NAPs should be leveraged to direct resources, both human and financial, into studying emerging trends or issues, with the aim of providing additional relevant information that can inform policy decisions and programmatic planning. Such activities could include dedicated analysis of a long-standing challenge, such as child trafficking as indicated in Example 6 of the Austrian NAP, a study of an emerging trend such as the impact of COVID-19 on instances of trafficking, or in-person monitoring visits and analysis of issues within local communities.



Example 6
Austrian 2021-2023 NAP

<p>Goal 2 Expanding research on human trafficking</p>				
<p>V.9</p>	<p>Prevalence study on the extent and dimensions of child trafficking in Austria</p>	<p>2021-2023</p>	<p>Competent authorities/ministries in co-operation with other stakeholders as well as, if applicable, research institutions.</p>	<p>Study</p>

The war against Ukraine, for instance, has dramatically altered the vulnerability to trafficking for those who have fled the country. Studying this vulnerability, and how it is impacting trafficking circumstances at the national or regional level in countries of transit and destination, is just one such emerging issue that should be highlighted for additional research in NAPs for 2024 and 2025.

Responding to the evolving nature and growing scale of THB

Beyond improving NAP structures to make them more effective and better resourced, modernizing NAPs is also about updating the nature and scope of programmatic work to more accurately reflect current anti-trafficking strategies and needs. As highlighted by the *Survey Report 2021 of Efforts to Implement OSCE Commitments and Recommended Actions to Combat Trafficking in Human Beings*, THB continues to evolve in terms of the profiles of victims, the means of recruitment, and ultimately the forms of exploitation. To respond effectively to these developments, State-led anti-trafficking efforts, including NAPs, must subsequently adapt and incorporate activities to address areas of increasing concern. This process should include not only new thematic areas of focus, but also efforts to advance strategies and tactics, for example moving beyond traditional capacity building efforts for law enforcement or low intensity awareness campaigns, and toward broader and more sophisticated prevention efforts that scale up national responses to new developments in the field.

Account for technology-facilitated trafficking

One of the ways THB has changed most dramatically in recent years is in the growing use of technology to recruit, control, advertise and exploit victims. For example, according to the Internet Watch Foundation, 2021 was the worst year on record for online child sexual abuse, as pandemic-related lockdowns saw children being targeted “on an industrial scale” by internet groomers.¹³ Another study concluded that ¾ of child victims of trafficking for sexual exploitation are now advertised online.¹⁴ Combating online recruitment and exploitation must be a key component of any modern anti-trafficking response.

Countering the misuse of technology within the business model of traffickers is a critical step in modernizing national responses to the crime. This topic can be incorporated into NAPs through traditional capacity building, as well as policy analysis and development. As seen in Example 7, from France’s 2019-2023 NAP, there is substantial concern over online exploitation and the online platforms hosting such abuse. Therefore, evaluating the regulation of those platforms and the possibility of content moderation standards for those platforms is an activity that can help advance efforts to counter online exploitation.¹⁵



Example 7 France 2019-2023 National Action Plan

Measure 35: Initiate a reflection on legislative developments in the area of trafficking.

A working group will be set up to reflect on the criminalization of human trafficking and the forms of exploitation referred to in article 225-4-1 of the Penal Code as well as on the related penalties.

A reflection will also be carried out on the means of action against the French hosts of Internet sites that authorize the diffusion of advertisements for purposes of prostitution, in particular on the extension of article 61 of the law of June 21, 2004 on confidence in the digital economy, to the offences of human trafficking and pimping. Partners: Ministry of the Interior, Ministry of Justice.

Lead partner: State Secretariat for Equality between Women and Men (Miprof)

Attention to technology-facilitated THB within NAPs should also consider the positive uses of technology to combat the crime. As highlighted by the OSCE publication *Leveraging innovation to fight trafficking in human beings: a comprehensive analysis of technology tools*, a plethora of applications and resources exist that can enable law enforcement to better identify exploitation online, as well as identify individuals seeking to traffic vulnerable persons. Two examples on how to address this include developing programmatic activities to enhance the capacity of law enforcement to utilize such tools, including in partnership with tech companies (as seen in Example 8 from the United States NAP), and, secondly, conducting a review of codes of criminal procedure to enable their full use in cases of online trafficking. This can help NAPs effectively guide national actors in enhancing the positive use of technology to combat human trafficking.



Example 8 United States of America National Action Plan 2021

Principle 3.2: Build capacity of law enforcement to investigate and prosecute human trafficking

Law enforcement investigators require advanced training to address the complex crime of human trafficking. Training programs should be survivor-informed. Topics should include: strategies to implement a victim-centered, trauma-informed approach; developing evidence of victims’ state of mind to use in prosecutions for coercion-based crimes; engaging in proactive investigations relying on financial and other intelligence; and investigating financial crimes and identifying assets. The United States Government can build its investigative capacity by expanding partnerships, such as with technology companies and child welfare systems in order to locate exploited children.

Prevent labour exploitation in supply chains

Efforts to combat labour exploitation also require diversification and scaling up. Traditional areas of focus, such as capacity building for labour inspectorates and improving labour law provisions are important in combating forced labour, but represent more reactive – rather than proactive – approaches to the problem. To prevent trafficking for labour exploitation, addressing the demand that fosters exploitation is required, and NAPs can strategically direct State resources towards addressing this issue by engaging public and private actors in adopting due diligence measures that promote sustainable supply chains and procurement.

For example, within the European Union, public procurement represents 14% of the region's Gross Domestic Product,¹⁶ amounting to roughly two trillion Euros.¹⁷ Leveraging this economic force to combat labour exploitation can dramatically decrease the market for goods and serves extracted from trafficked persons, and the profits made off that exploitation. Example 9 from the Canadian National Strategy to Combat Human Trafficking demonstrates what this could look like in practice, by directing resources towards the formulation of human rights and labour rights requirements for government suppliers, and engaging with the private sector on addressing issues of forced labour. Such activities effectively leverage the capacity of NAPs to generate political will, while also employing the economic power of the State to combat trafficking.



Example 9
Canada THB Strategy
(Note: the Strategy is a broader policy document than a NAP)

Improving ethical behaviours and preventing human trafficking in federal procurement supply chains. The Government will outline requirements on human and labour rights for suppliers and will work closely with suppliers to develop and implement tools to help ensure compliance in their supply chains. It will also examine long-term approaches to addressing child labour and forced labour in federal procurement supply chains, working with the private sector, civil society, and international partners.

Such activities should not be limited to the public sector. Private businesses also have a substantial role to play in combating labour exploitation and NAPs can facilitate the engagement of the private sector. Activities such as those in Example 10 from the 2022-2024 Polish NAP, which include awareness raising for the business community on due diligence legislation, are one avenue for action. Opportunities also exist for NAPs to advance the knowledge of the private sector on how to combat labour exploitation within supply chains, as well as engaging with political stakeholders with the purpose of enacting legislation to strengthen harmonized requirements on the business community to improve national efforts to prevent THB for forced labour.



Example 10
Poland National Action Plan 2022-2024

II.8 Development of information materials and implementation of information meetings and workshops for entrepreneurs on due diligence procedures in the area of human rights in business. Activities will address the phenomenon of trafficking in human beings for forced labour and the obligations of companies under new legislation to develop environmental and human rights due diligence procedures

The task will be implemented by: Ministry of Development Funds and Regional Policy in co-operation with other ministries and external partners co-operating within the Team for Sustainable Development and Corporate Social Responsibility and its working groups

Timeframe: 2022-2024

Indicator: the number of enterprises participating in events and covered by the distribution of information materials.

Target the demand that fosters trafficking for sexual exploitation

It is similarly important for NAPs to update their approaches towards preventing trafficking for sexual exploitation. As highlighted in the OSCE publication *Discouraging the demand that fosters trafficking for the purpose of sexual exploitation*¹⁸, OSCE participating States have a positive legal obligation to discourage demand. Yet, in the area of sexual exploitation, State anti-trafficking efforts rarely meet this commitment. As previously noted, more often than not, activities within NAPs that pertain to demand in the context of sexual exploitation are limited to low intensity awareness campaigns with little evidence of effectiveness. Far less investment is made into more proactive forms of engagement, such as online deterrence and disruption, or educational classes and content targeted particularly at men and boys on the harms associated with paying for sexual services, and the need to foster a culture of consent.

Strengthen financial investigations

In Example 11, item 1.3.D from the 2021-2023 Spanish NAP demonstrates how a NAP can promote one of these types of initiatives – education – on demand within its programmatic activities.



Example 11 2021-2023 Spain National Action Plan

1.2.D Promote the inclusion, at the different educational levels, of training and information for the youth population with the aim of discouraging demand. MEFP

In developing activities on demand, it is important for NAPs to plan for sustainable and proactive means of prevention, as one-off initiatives are unlikely to achieve substantial impact on the problem. Embedding broad education programme on demand and gender equality into school curricula represents a more strategic, proactive and sustainable approach by seeking to impact especially young men and boys over a longer period of time before their actions can foster exploitation.

Examining legal approaches to demand is another important aspect of work that NAPs could consider. Example 12 from the Hungarian NAP illustrates what this could look like in practice, with a review of the implementation of existing legislation on demand, in this case the criminalization of the “knowing use” of services of a trafficking victim, and assessing the need to revise that legislation so as to improve its legal application and practice. Such activities serve to ensure that the legislative and normative response to demand remains effective within a national context, and ensures that those who are paying to exploit victims are held accountable.



Example 12 2020-2023 Hungary National Action Plan

III.3.2. Investigating the practice of criminalizing the deliberate use of services provided by victims of trafficking; examining and monitoring the legal application and practice of the criminalization of the use of services, and the assessing the possible need to modify the new legislation

As a financially motivated crime, THB creates substantial monetary flows that can - in part - be traced by banks and other financial institutions. Systematic financial intelligence and routinely conducting financial investigations can help identify both trafficking victims and perpetrators, cut off the lifeline for human exploitation, and seize assets that can be used for victim support and reparation. However, to date, NAPs have been slow in incorporating this work into national efforts on identification and prosecution, leaving a useful tool underdeveloped and underutilized across the OSCE region.

To enhance national capacities to identify, investigate and freeze financial assets associated with THB crimes, NAPs must incorporate action points on: involving financial intelligence units into the States’ anti-trafficking co-ordination and consultation mechanism, analyse trafficking threats and risks to money laundering, establish platforms for partnership with financial institutions, develop joint and targeted training activities for criminal justice actors and financial intelligence units, and dedicate resources towards raising awareness. Example 13 from Bosnia and Herzegovina demonstrates how a NAP can accomplish these goals.

For law enforcement, this work should include not only establishing the capacity to conduct financial investigations, improving knowledge of red flag indicators, and training on how to analyse financial data, but also how to incorporate this information into wider investigations and prosecutions of THB crimes. In this regard, the successful identification of financial evidence can corroborate, if not replace, victim testimonies, and thereby reduce the burden on victims, while providing stronger evidence for prosecutions and claims for victim compensation.

Encouraging co-operation between financial intelligence units and private financial institutions is another area where NAPs should play a leading role. As highlighted by *Following the Money: Compendium of Resources and Step-by-step Guide to Financial Investigations into Trafficking in Human Beings*¹⁹, such partnerships improve the development of red flag indicators for THB within financial flows, and enhance investigations into THB crimes by increasing the capacity to identify potential instances of trafficking.²⁰ NAPs can facilitate this process by convening relevant stakeholders and providing funding for such partnership mechanisms. Example 14 from the 2021-2023 NAP of Latvia, which seeks to develop an exchange of information between the Financial Intelligence Unit, the State Prosecutor, and the private sector, illustrates what this initiative could look in practice, with the development of a memorandum of understanding and a number of co-operation activities representing easily identifiable outcomes from such engagement.



Example 13
Bosnia and Herzegovina 2020-2023 NAP

Strategic program 3.9. Increase the application of confiscation of proceeds of trafficking

	Activity	Deadline	Implementing Institution	Implementation Indicator	Necessary Resources
3.9.1	Intensify the application of the Guidelines for main plaintiffs on inclusion financial investigation occasion conducting investigations in cases corruption, organized	Continuous	High court and Prosecutorial Council Prosecutor's Office of BiH	Number of spent financial investigation in trade cases people Number and value temporarily and permanently confiscated property	Regular budget: <ul style="list-style-type: none"> • High judicial and prosecutorial council • Prosecutor's Office of BiH
3.9.2	Strengthening implementation capacity financial investigations in the domain discoveries property uses obtained by criminal offenses of trafficking people.	Continuous	High court and Prosecutorial Council Prosecutor's Office of BiH State Agency for investigation and protection	Number of specialized investigators and prosecutors for financial investigations	Regular budget: <ul style="list-style-type: none"> • High judicial and prosecutorial council • Prosecutor's Office of BiH • State Investigation Agency and protection



Example 14
2021-2023 Latvia National Action Plan

4.5	To develop and improve co-operation and exchange of information with the Financial Industry Association, its members and credit institutions.	A memorandum of co-operation has been developed and concluded.	Signed document, number of co-operation activities,	leM	VP, FID, Prosecutor's Office of the Republic of Latvia	Permanently until 31.12.2023.	Within the financial resources provided for in the Law on the State Budget for the current year.
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Respond to trafficking for forced criminality

Another relevant issue for NAPs to consider is the rise in forced criminality across the OSCE region. The *Survey Report 2021 of Efforts to Implement OSCE Commitments and Recommended Actions to Combat Trafficking in Human Beings (Survey Report)* published by the OSR/CTHB in 2022 highlighted the dramatic growth of identified cases of trafficking for the purpose of forced criminality within OSCE participating States. In 2016, only 1.9% of identified victims were exploited in criminal activity. In 2020, 22.2% of identified victims were exploited for this purpose.²¹ Responding to this trend is important in ensuring that anti-trafficking responses remain effective in countering all forms of exploitation, and leveraging NAPs to conduct research into the rise of THB for forced criminality can serve as a first step to improving national responses to this growing challenge.

Serving victims: needs-based interventions for under-served populations

In order to meet the evolving needs and vulnerabilities of different victims, national anti-trafficking systems should promote victim-centred approaches and robust identification measures, as well as ensure support to all victims without discrimination. Many of these interventions extend beyond traditional protection considerations and should be mainstreamed throughout the national response. Below are three areas where NAPs in the OSCE region can advance these goals.

Develop targeted identification and protection measures

Establishing nuanced and non-discriminatory protection systems requires a combination of legislative, operational and capacity building measures, in order to ensure comprehensive assistance to all victims. NAPs are critical to advancing such measures and should incorporate activities aiming to:

- De-link formal recognition of victims of trafficking from their participation in criminal proceedings as an avenue to mid- and long-term assistance;²²
- Diversify the range of actors mandated to refer presumed trafficking victims to support services;
- Ensure the provision of quality services to victims of trafficking that address their individual needs, by developing robust standards for such services, training service providers and the implementation of victim needs assessments;
- Ensure equal treatment of domestic and foreign victims of trafficking;
- Promote and support the application of the non-punishment principle with regards to human trafficking victims.²³

Below, an example of how these issues have been incorporated into the Hungarian NAPs.



Example 15
Hungary National Action Plan 2020-2023

II. Victim identification, referral of victims, victim assistance				
	A	B	C	D
II.3.	Clear definition of the elements and members of the social care system, development of methodological guidelines	The measure is in line with. Recommendation 16 of GRETA's 2015 first evaluation round and the recommendations of the 2019 second evaluation round.	Ministry of Interior, Ministry of Human Capacities, Ministry of Justice, National Police Headquarters	European Union and governmental
II.4.	Expanding the scope of victim identification bodies, while reviewing the list of indicators of becoming a victim and monitoring data provision	The objective is included based on feedback of the members of the National Coordination Mechanism.	Ministry of Justice	European Union and governmental
III. Judiciary, law enforcement				
	A	B	C	D
II.3.	Revision of legislation concerning the means of proof acquisition, and acts of proof, as well as the examination of the possibility for victims to be exempted from liability for offenses committed in their vulnerable position	The objective is included based on feedback of the members of the National Coordination Mechanism and in order to approximate domestic and international practices.	Ministry of Interior, Ministry of Justice, National Police Headquarters	European Union and governmental

Adopt gender sensitive approaches

Trafficking remains a highly gendered crime: 92% of identified victims of trafficking for the purpose of sexual exploitation are women and girls, while men and boys represent 59% of identified victims of trafficking for forced labour.²⁴ National efforts must consider these dynamics and properly reflect the prevailing trends; however, the picture is more complicated and nuanced than this data snapshot suggests; for example, identification of male victims of sexual exploitation is on the rise and labour exploitation frequently affects female victims.

NAPs play a critical role in accounting for these aspects by mainstreaming gender-sensitive approaches within anti-trafficking work, and thus ensuring that prevention efforts are adequately tailored to the diversity of at-risk groups and situations, and that all victims are duly identified and their traffickers held accountable. This process includes adjusting victim services to gendered needs, such as housing, healthcare, psychological support and job training. Providing funding and support for tailored assistance to victims who do not fit the “ideal victim” profile is also critical. NAPs can facilitate the development and implementation of gender-sensitive responses by allocating human and financial resources to provide responsive services.



Example 16 Italy 2022-2025 National Action Plan (part 4 of Introduction)

The gender perspective in the anti-trafficking response: application of the 'gender sensitive-approach' and victim protection

The recognition of the importance of the gender perspective and of the need to build and systematize approaches that are increasingly focused on the needs of victims in the counter-trafficking response, is enshrined within a number of legally binding international instruments and commitments such as, as already highlighted, the Palermo Protocol, the Council of Europe Convention on Action against Trafficking in Human Beings, the European Parliament Directive 2011/36/EU; the OSCE participating States have also adopted in recent years a series of specific commitments on the issue, recognizing gender-based discrimination among the root causes of human trafficking (PC. DEC/557, MC.DEC/10/11) and stressing the need to address gender-specific aspects in the anti-trafficking response (MC.DEC/6/17, MC.DEC/7/17).

A positive example from the OSCE region of such a gender sensitive approach applied across its anti-trafficking activities is the 2022-2025 Italian NAP.²⁶ The NAP ensures that awareness raising, capacity building and educational activities - all consider the gendered needs of victims, in support of both early identification and protection of victims.

NAPs must also consider the gendered dimensions of trafficking when seeking to improve the criminal justice responses to THB, to prevent overlooking the identification of victims who do not fit the “ideal victim” profile. Awareness raising, educational- and capacity building activities should be included within NAPs to improve the capacity of law enforcement actors, as well as other stakeholders who interact with presumed victims, to identify all victims, including for example men and boys trafficked for sexual exploitation, and engage with them in a gender-sensitive, trauma-informed and victim-centred manner.

Consider needs of vulnerable groups

National minorities and other vulnerable populations are often more susceptible to human trafficking, due to a range of socio-economic factors, discrimination and reduced trust in State authorities and systems. Within the OSCE region, this appears to be particularly pronounced for indigenous communities in North America, as well as the Roma community in Europe. Given the overrepresentation of these groups among identified victims of human trafficking, NAPs must also adjust and tailor anti-trafficking efforts and systems to reflect their needs and vulnerabilities, and ensure proper identification and protection of such victims.

In States that have specific strategy documents or National Action Plans on minority issue, it's crucial to align anti-trafficking NAPs with those strategies, and ensure cross-reference to ensure States's effort remain consistent.

Example 17 from the Canadian 2019-2024 National Strategy to Combat Human Trafficking - which calls for the creation of case-management standards that provide vulnerable groups, in particular indigenous women and girls, with access to tailored services - demonstrates one way of ensuring the protection needs of such groups are met.



Example 17 Canada 2019-2024 National Strategy to Combat Human Trafficking

Establishing a national case-management standard for organizations (i.e. community service groups and victim services) with a special focus on vulnerable groups, such as Indigenous women and girls, at-risk youth, and migrants to ensure victims have access to services that address their specific needs and assist them in their recovery and healing.

NAPs also have a role to play in ensuring that national protection systems are equipped to handle the needs of other vulnerable groups, such as individuals with physical and mental disabilities, by promoting awareness raising and training for anti-trafficking stakeholders, including in the welfare and healthcare sectors.

Finally, NAPs should provide the framework for national authorities to collect quantitative and qualitative information on the presence of various groups with heightened vulnerability among identified victims of trafficking, to gain a better understanding of the scale and means of their exploitation.

Conclusion

As trafficking in human beings grows in scale and pervasiveness, with ever growing estimated profits²⁷ and number of victims²⁸ worldwide, effectively combating this crime requires a strategic, co-ordinated and well-resourced national response, utilizing a whole-of-society approach. National Action Plans serve as the primary planning and mid-term strategy documents for States' efforts to combat trafficking, and are fundamental to the successful delivery of a response that will ensure duly identification and protection of victims, prosecution of traffickers and ambitious and effective prevention activities.

Strategic and comprehensive National Action Plans are crucial tools for States to design, organize and fund anti-trafficking actions. In order to be effective, NAPs should be clear and actionable, providing direct guidance on what activities are prioritized, who within government structures is responsible for delivering those activities and on how and when they will be implemented and funded.

As trafficking evolves and expands, NAPs become indispensable tools for States to adequately respond to the changing nature of the crime and build a path to success in defeating this scourge.



National Action Plans are fundamental to the successful delivery of a response that will ensure duly identification and protection of victims, prosecution of traffickers and effective prevention activities”

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