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Datum 21 oktober 2025
Betreft Official reaction on the third evaluation report of the Group of
Experts on Action in Trafficking in Human Beings

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Dear ms. Nestorova,

The Netherlands would like to thank the Group of Experts on Action against Trafficking in Human Beings (GRETA) for the third evaluation on the implementation of the Council of Europe Convention on Action against Trafficking in the Netherlands. The recommendations in the report are of great value for the Dutch approach to combat human trafficking. The Netherlands would therefore like to express its appreciation for GRETA's extensive work and effort which led to the third evaluation report of the Netherlands.

The Netherlands is pleased to learn that GRETA values the improvement of the Dutch approach on human trafficking. It is important that GRETA highlighted some of the positive developments and aspects of this approach as it is a motivation for all partners involved in fighting human trafficking in the Netherlands to continue on the chosen path. We are also aware that there is room for improvement and we thank GRETA for the recommendations given in the report. The recommendations can contribute to the continued enhancement of efforts to combat human trafficking in the Netherlands.

This letter includes the reaction of the Dutch government on GRETA's recommendations made in the third evaluation report, published on November 9th 2023. Some of the recommendations have already been discussed in the formal letter shared on the 6th of October 2023 with the GRETA secretariat while others have been discussed during the roundtable meeting with GRETA and relevant partners on the 8th of July 2025 in the Hague. Attached to this letter you will find the detailed comments on GRETA's report and the recommendations that are included.

Yours sincerely,

The Minister of Justice and Security

F. van Oosten

Comments of the Kingdom of the Netherlands to the list of GRETA's conclusions and proposals for action proposed in the 2023 Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings

Topics related to the third evaluation round of the Convention

Right to information

- **GRETA welcomes the availability of information materials in different languages for victims of trafficking and considers that the Dutch authorities should continue to make efforts to ensure that all presumed victims of trafficking are given information in a proactive manner, as soon as they come into contact with a competent authority. The information should take into account victim's age, maturity, intellectual and emotional capacity, literacy and any mental, physical, or other disability which may affect the ability to understand. The information should be provided irrespective of the victim's capacity or willingness to co-operate in criminal proceedings and include the right to a recovery and reflection period, the services and assistance measures available, state compensation procedure and other relevant civil and administrative remedies and procedures (paragraph 44).**
- Section B8/3.1 of the Aliens Circular grants victims of human trafficking a temporary residence permit on humanitarian grounds ("B8/3") for the duration of a three-month recovery and reflection period. Subsequently, they can be granted a temporary residence permit for one year, which is renewable. The Action plan *Together against Human Trafficking* explores whether and how the criminal proceedings can be separated from the process of granting a residence permit to a foreign victim of human trafficking. Within this context an organization other than the investigative services should be able to grant the recovery and reflection period. This study also examines standardizing the process to offer all organizations a recovery and reflection period and to provide victims with all necessary information based on their needs and characteristics.

Information provision to migrant workers

Work in NL (WiN) is a physical and mobile information point for migrant workers where migrant workers can go to for information, assistance and services in their own languages. Staff working in the different information points are trained to support victims of human trafficking and can deliver adequate information about their specific rights including the recovery and reflection period. Besides the physical and mobile information points, there

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is also a website¹ which informs migrant workers in 9 languages about their rights.

- ➤ **GRETA also considers that the Dutch authorities should take further measures to increase the number of qualified interpreters who are sensitised to the issue of human trafficking and the vulnerabilities of victims, and to ensure their timely availability (paragraph 45).**

When language poses a barrier to conduct a proper interview with a potential victim, front-line officials including law enforcement and immigration, will use an interpreter to conduct the interview. This includes the Royal Netherlands Marechaussee (Kmar), police, National Labour Authority (NLA) and Immigration and Naturalisation Service (IND).

Legal assistance and free legal aid

- **GRETA welcomes the availability of free legal assistance and legal aid for victims of trafficking in the criminal proceedings against perpetrators, and considers that the Dutch authorities should take additional measures to ensure that all presumed victims of trafficking have effective access to free legal assistance and legal aid in related fields, like civil, labour and immigration law (paragraph 55).**

As GRETA mentions it is possible for victims of human trafficking to apply for free legal assistance and legal aid in the criminal proceedings. In order to strengthen effective access to this, several positive developments have to be mentioned. The Ministry of Justice and Security has been working on a pilot that focusses on proactively providing legal aid at an early stage to victims of serious sexual and/or violent crimes. This means a lawyer will contact victims, if they consent to this, after their initial contact with the police, so they don't have to contact a lawyer themselves. This includes victims of human trafficking if the trafficking involves violence. The pilot was successful and the Ministry of Justice and Security is currently exploring the options how this method can be implemented nationwide. Furthermore, the municipality of Amsterdam has been funding a lawyer for over 20 years, who provides legal assistance to possible victims of mainly criminal exploitation. The lawyer explores together with the potential victims options from escaping control of criminals and avoiding prosecution, without having to report to the police.

Psychological assistance

- **GRETA considers that the Dutch authorities should guarantee timely access of victims of trafficking to psychological assistance and ensure that it is provided for as long as their individual situation requires, in order to help them overcome the trauma they have been through, and achieve a sustained recovery and social inclusion (paragraph 59).**

In the Netherlands several services are available for victims of trafficking including shelter, medical, social and psychological care, and legal counsel.

¹ [Werken en wonen in Nederland | Work in NL](#)

Quality of care is a prerequisite in the contracts that are signed by providers and shelters. The starting-point is tailor-made solutions for the victim. If a victim has no safe place to go, they can under certain conditions apply for a place in a reception institution, where they will be provided with psychological assistance and guidance to social recovery. Depending on their situation they will be placed in the following shelters:

- Victims with lawful residence are under the Social Support Act (Wmo) entitled to the shelter for Dutch victims, where they will receive training and psychological assistance.
- Victims without lawful residence, and who are in the reflection period, are entitled to care and support within the Categorical Shelter for Victims of Human Trafficking (COSM), which includes also psychological assistance.
- Victims in the asylum procedure are entitled to reception in an asylum seeker centre, where they can get psychological assistance when needed.

If necessary or possible, psychological assistance can be provided instead of or after stay in shelters (outpatient care). The Social Support Act is intended to support victims to participate independently in society after the exploitation situation. Assistance and support is provided as long as necessary and contributes to recovery and social inclusion.

Access to work, vocational training and education

- **GRETA considers that the Dutch authorities should strengthen effective access to the labour market for victims of THB and their economic and social inclusion through the provision of vocational training and job placement, raising awareness amongst employers, and the promotion of micro-businesses, social enterprises and public-private partnerships, including through state supported employment programmes, with a view to creating appropriate work opportunities for victims of trafficking (paragraph 63).** Shelters for victims of human trafficking offer different courses aimed at improving the self-reliance and independence of victims of human trafficking which includes supporting them in finding a job placement or improving their access to the labour market. Depending on the shelter, various courses are offered, aimed at developing language skills, job skills and professional training. In some shelters job coaches support victims to work and/or a training program. The Coordination Centre against Human Trafficking (CoMensha), which is partly responsible for placing victims in shelters, is in touch with recruitment agencies to facilitate access to work for victims.

Compensation

- **GRETA welcomes the attention paid to victim compensation in the Netherlands and considers that the authorities should make efforts to guarantee effective access to compensation for victims of**

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human trafficking, in line with Article 15 (4) of the Convention, including by:

- **ensuring that victims of trafficking for the purpose of labour exploitation can obtain compensation from the perpetrator as part of criminal proceedings, and allowing all victims of trafficking to join the criminal proceedings against the perpetrator and claim compensation, regardless of the number of victims in the case;**
- **enabling all victims of trafficking to effectively exercise their right to compensation in civil and labour law proceedings (paragraph 76).**

Working with the assumption that GRETA refers to cases of labour – and other forms of – exploitation prosecuted under 273f of the Dutch Criminal Code, there is already the possibility for victims to claim compensation. In cases where the National Victim Support desk (part of the Public Prosecution Service) is in contact with a victim, who is not involved in the criminal proceedings, there is always contact with the victim to look for alternatives, for example to start a civil procedure. In other cases the victim is entitled to the criminal proceedings.

Investigations, prosecutions, sanctions and measures

- **GRETA urges the Dutch authorities to strengthen their efforts to investigate and prosecute cases of human trafficking for the purpose of labour exploitation (see also paragraph 163) (paragraph 95).**

Since 2023 the NLA's criminal approach to labor exploitation was further intensified and professionalized by centralizing investigative work on labor exploitation within a central Labor Exploitation Department. This department is solely for criminal investigations into human trafficking for the purpose of labor exploitation and is responsible for the entire investigation process. The department has been expanded during 2023 en 2024 and all of the detectives received special training. The department has its own front office where signals of potential labor exploitation can be reported. The front office operates alongside the Reporting Information Center (MIC), the Inspectorate's central reporting point, and is primarily intended as a point of contact for supply chain partners. Signals of suspected labor exploitation that the MIC receives from employees or other reporters are also forwarded to this front office. All reports are then registered, enriched, and assessed to determine the appropriate follow-up action.

- **Further, GRETA considers that the Dutch authorities should take additional measures to strengthen the criminal justice response to THB, including by:**
- **ensuring that trafficking offences are classified as such every time the circumstances of a case allow this; the concept of "abuse of a position of vulnerability", which is part of the definition of human trafficking, should be properly applied in practice;**

With respect to GRETA's recommendation on the correct and consistent application of the concept of "abuse of a position of vulnerability", the

Netherlands notes that this concept is already firmly embedded in prosecutorial practice. In virtually every indictment for trafficking in human beings, the Public Prosecution Service includes abuse of a vulnerable position or abuse of factual circumstances as part of the charges, where supported by the evidence.

Moreover, structural improvements are being introduced through legislative reform. On 10 June 2025, the House of Representatives approved the Bill on the Modernisation and Expansion of the Criminalisation of Human Trafficking, which is currently before the Senate. This Bill expressly incorporates the concept of “abuse of a position of vulnerability” into the statutory definition of THB, in line with GRETA’s previous recommendations. It also clarifies that for certain groups, such as persons with intellectual disabilities, undocumented labour migrants and young sex workers, vulnerability may be presumed due to their inherent dependence and reduced capacity to resist exploitation.

In addition the Public Prosecution Services ensures that all specialised training for prosecutors consistently emphasises the importance of qualifying conduct as trafficking offences as such whenever the circumstances of the case allow, rather than resorting to related offences.

- **develop the legal framework to enable the use of technological developments to gather material, documental, financial and digital evidence;**

On 1 April 2025, the Dutch Parliament adopted the new Code of Criminal Procedure. This reform introduces provisions that explicitly regulate the systematic and automated retrieval of personal data concerning suspects from publicly accessible sources. These provisions create a clear and lawful basis for the deployment of web crawlers and similar automated investigative tools as special investigative techniques.

Concerning victims, proactive and technology-supported victim identification is already permissible under the existing legal framework. The police, acting under the authority of the Public Prosecution Service, makes use of automated monitoring tools and digital analysis to detect indicators of online recruitment, exploitation patterns, and other signals of trafficking. These practices support early intervention, rapid safeguarding measures, and timely initiation of criminal investigations.

Together, the updated legal framework for suspects and the existing operational tools for victim identification strengthen the Netherlands’ capacity to respond effectively to technology-facilitated forms of human trafficking.

- **ensuring that the length of court proceedings in cases of trafficking of human beings is reasonable, in line with the case-law of the European Court of Human Rights (Article 6, paragraph 1 of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ) (paragraph 96).**

The Public Prosecution Office notes that the length of legal proceedings is a matter of concern in general.

Non-punishment provision

- **GRETA once again considers that the Dutch authorities should take further steps to ensure consistent application of the principle of non-punishment of victims of THB for their involvement in unlawful activities, to the extent that they were compelled to do so. Consideration should also be given to adopting a specific legal provision on the non-punishment of victims of trafficking for their involvement in unlawful activities, to the extent that they were compelled to do so, as part of the planned revision of Section 273f of the CC (paragraph 103).**

During the plenary debate on the Bill on the Modernisation and Expansion of the Criminalisation of Human Trafficking (Article 273f Criminal Code), the House of Representatives adopted an amendment introducing an explicit statutory provision on the non-punishment principle in Section 273f(9) of the Criminal Code. As a result, the non-punishment principle will be formally codified within Dutch anti-trafficking legislation.

It should be noted that the non-punishment principle has long been applied in prosecutorial practice and is already embedded in the Prosecution Service's policy framework, including in the directives issued by the Board of Procurators General (Aanwijzing Mensenhandel en Aanwijzing Sepotgronden). Statutory codification, however, provides a stronger and more explicit legal foundation, enhancing legal certainty for practitioners and victims alike.

The legislative amendment also provides for an appropriate moment to review and update the relevant prosecutorial policies, as well as to align them with the obligations stemming from the revised EU Anti-Trafficking Directive. Furthermore, Action Line 2 of the National Action Plan places particular emphasis on ensuring that frontline investigative authorities remain fully aware of the non-punishment principle and the possibility that individuals initially regarded as suspects may in fact be victims of human trafficking.

Protection of victims and witnesses

- **GRETA invites the Dutch authorities to make full use of all measures available to protect victims and witnesses of THB to prevent retaliation and intimidation during investigation and/or after the court proceedings (paragraph 109).**

The police and Public Prosecution Service prepare an individual assessment of the risks faced by crime victims, which includes victims of THB. General protection measures for victims and witnesses include the possibility for the victim to give evidence outside the presence, or at least the view, of the defendant, by videoconference or, in exceptional cases, completely anonymous. It is also possible that the record of the interrogation of a victim by an investigating judge during the criminal

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investigation can be used at the trial of the perpetrator later. Furthermore, the Dutch prosecutors directive includes minimum standards of the proper treatment of victims during the investigation, court proceedings, providing information of or assistance with immigration relief, legal support and advice and free victim support.

Specialised authorities and co-ordinating bodies

- **GRETA welcomes the existence of specialised entities and professionals to deal with THB cases and the training provided to them, and invites the Dutch authorities to continue building the capacity and specialisation of police officers, prosecutors and judges in the area of THB (paragraph 118).**

Knowledge about human trafficking is ensured among the various parties through various training courses. These programmes cover amongst others investigative techniques and victim identification. In addition, with the entry into force of the new bill 273f, knowledge will be expanded if necessary.

- The Council for the Judiciary mentions that every court has judges who are trained/specialized in human trafficking cases. These judges have undertaken courses on this subject, which also cover case law. This ensures that the necessary knowledge is available in every court. In addition, the Study Center for the Administration of Justice (SSR) offers several courses each year in the field of human trafficking. These courses have been developed specifically for employees of the Public Prosecution Service and the judiciary who deal with such cases. In addition, a group has recently been established within the courts, consisting of human trafficking experts from all courts, who exchange knowledge and case law and will also organize an annual national knowledge day for all judges for this purpose.
- The subject of human trafficking is included in the basic police training. In the second year of this training, the topic of human trafficking is addressed through learning activities and knowledge materials accompanying the assignments 'surveillance, nuisance, and crime'. The aim is for students to observe their working environment, identify anomalies (including human trafficking, if present) and then take appropriate action, record their findings and pass them on to the relevant internal and/or external partners. In addition, in recent years, efforts have already been made to train all front-line police officers to recognize signs of human trafficking. After completion of this training round in 2023, the e-learning course on recognizing signs of human trafficking is made permanently available to all police officers.
- With the forthcoming entry into force of the amended Article 273f (see answer above), additional training modules will be developed to ensure that all practitioners are fully familiar with the updated legal framework, including the incorporation of vulnerability (as mentioned before), the non-punishment principle (idem), and the expanded scope of criminalisation. The Netherlands will continue to invest in strengthening

both capacity and specialisation within the criminal justice chain to ensure a consistent, expert and victim-centred response to THB.

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International co-operation

- **GRETA welcomes the efforts made by the Netherlands in developing international co-operation in combating THB, including through participation in JITs and engagement in EMPACT, and invites the Dutch authorities to continue developing multilateral and bilateral co-operation in combating THB (paragraph 124).**

International cooperation is an important part of the Dutch approach to human trafficking. The Netherlands is active in various international partnerships, including EMPACT and ELPACCTO. The Netherlands remains committed to international cooperation and will strengthen it wherever possible.

Role of businesses

- **While welcoming the adoption of the National Action Plan on Business and Human Rights, GRETA considers that the Dutch authorities should further strengthen engagement with the private sector, in line with the UN Guiding Principles on Business and Human Rights and Council of Europe Committee of Ministers Recommendation CM/Rec(2016)3 on human rights and business and CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation, with a view to raising awareness of the role and responsibility of businesses in supporting the rehabilitation and recovery of victims, and facilitation access to remedies (paragraph 133).**

The private sector in the Netherlands can play an important role in the fight against human trafficking. Therefore, the Dutch government takes part in the COMCRIM-project, an interdisciplinary research project that studies crimes that undermine democracy and the rule of law in and via the Netherlands. The project is conducted by a public-private consortium of 22 partners, including four universities, ministries, banks, law enforcement and intelligence agencies, NGOs, and network organisations. The focus of the project is the business model behind organised crime, which relies on people, money and infrastructure. The core research areas are human trafficking, money laundering and corruption. Using unconventional data sources such as banking records, COMCRIM develops methods for proactive detection, following financial flows, and map criminal networks. The Netherlands will further strengthen the cooperation with the private sector by actively looking for new opportunities and reaching out to private partners in the fight against human trafficking.

- **Further, GRETA considers that the Dutch authorities should adopt legislation integrating the prevention of THB and labour exploitation in public procurement policies and promoting transparency in supply chains to enable scrutiny of companies' performance and prevent THB and labour exploitation (paragraph 134).**

The procurement and tendering policy "Procurement with Impact" of the central government is an important instrument. This policy focuses i.a. on socially responsible contracting and procurement and the prevention of forced labor, labor exploitation, and social rights. These issues fall within the framework of the International Social Conditions (ISV) policy. This framework mandates the application of the ISV contract clause on due diligence for sustainable supply chains in contracts exceeding the European threshold in predefined risk categories. This contract clause ensures that contracted suppliers have policies and processes in place to identify, prevent, mitigate and remedy adverse impacts on people and the environment in their own operations and supply chains. The clause, including the concepts used, is based on the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy. ISV is also included in the government wide Dutch National Plan on Sustainable Public Procurement (SPP) for 2021-2025. Here too the Dutch government is complying with the GRETA recommendation, which calls for the prevention of victims of human trafficking or labor exploitation and the promotion of transparency in the supply chain through its own procurement and tendering policy.

Follow-up topics specific to the Netherlands

Developments in the legal, institutional and strategic framework for action against trafficking in human beings

- **GRETA welcomes the Human Trafficking Field Lab project and invites the Dutch authorities to continue the project beyond 2023 (paragraph 20).**

In the Netherlands, various Field Labs have been or are currently active, focusing on various themes related to human trafficking, including sexual exploitation, criminal exploitation, and tackling clients. The success of the field labs is a reason to continue with them in the future.

- **GRETA welcomes the involvement of municipalities in action against THB and invites all municipalities to adopt policies to combat THB (paragraph 21).**

Municipalities play an important role in signalling and fighting human trafficking on a local level. In the Inter-Administrative Program it has been agreed that all municipalities will develop policy to tackle human trafficking, including providing properly arranged care and shelter for victims. A project leader has been appointed at the Association of Dutch Municipalities (VNG) to support municipalities in developing an effective approach to human trafficking and arranging (regional) care and shelter.

- **GRETA considers that the Dutch authorities should commission an independent evaluation of anti-trafficking national programmes as a tool for assessing the impact of the activities and for planning future policies and measures to combat THB (paragraph 26).**

The National Action Plan will be independently evaluated.

Data protection and data collection

- **GRETA considers that the Dutch authorities should provide practical guidance on data protection to NGOs and professionals likely to encounter victims of THB in order to avoid breaches of data protection legislation and ensure that all presumed victims of THB are properly reported and provided with protection and assistance (paragraph 141).**

Central to action line 5 of the National Action Plan is the improvement of information sharing and data processing between different agencies involved in the fight against human trafficking. Part of this is an analysis of existing cooperation covenants and the data-sharing guide which facilitates information sharing between chain partners. Based on this analysis a better overview is created of which additional or amended regulations or agreements are needed to improve data sharing and improved guidelines are made for professionals to optimize the process and to benefit the fight against human trafficking.

- **GRETA considers that the Dutch authorities should ensure that data on THB are made available in a timely manner to serve as an evidence base for future policy measures (paragraph 144).**

Figures on Labour Exploitation and Serious Harm have been published by the Netherlands Labour Authority (NLA) since 2021. Since 2022, these numbers have been published in factsheets. The latest was published on September 3, 2025, and contains the annual figures for the year 2024².

Measures to prevent and combat trafficking for the purpose of labour exploitation

- **GRETA urges the Dutch authorities to intensify their efforts to prevent and combat THB for the purpose of labour exploitation, taking into account GRETA's Guidance Note on combating trafficking for labour exploitation and the CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation. This should include steps to:**
 - **ensure that cases of THB for labour exploitation are not treated as "serious disadvantage" cases;**

With regards to this paragraph the NLA would like to mention that it has previously described in detail the process that a report of (possible) labour exploitation or (possible) serious disadvantage goes through³. It receives reports of labour exploitation and reports of serious violations of labour laws that may cause serious disadvantage. It investigates all such reports and follows them up where possible. Criminal law (investigation) in the case of suspected labour exploitation as referred to in art 273f of the Criminal Code, and administrative law (supervision) in the case of serious violations of labour laws ('serious disadvantage'). As for the investigation process, no distinction is made between serious disadvantage and labour exploitation. This means that any report on this topic is taken up as a report of (possible) labour exploitation. I would like to refer the experts to

³ [Factsheet arbeidsuitbuiting en ernstige benadeling 2024 | Publicatie | Nederlandse Arbeidsinspectie](#)

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the policy response to the “Dadermonitor 2017 – 2021” in which this has been explained in detail⁴.

- **ensure that labour inspectors, law enforcement officers and other relevant actors increase their capacity to detect and identify victims of THB for the purpose of labour exploitation, paying particular attention to at-risk sectors, such as logistics, construction, food processing, agriculture and horticulture;**
See the answer to paragraph 95.
- **take effective steps to regulate recruitment and temporary work agencies to strengthen prevention of THB and labour exploitation (paragraph 163).**

The report of the Taskforce Protection of Labour Migrants includes recommendations on regulating the recruitment and temporary work agencies in order to prevent human trafficking of labour exploitation. On 11 November 2025, the Dutch Senate adopted the Admission for Allocation of Workers Bill (Agency Licensing Bill). The Ministry of Social Affairs and Employment (SZW) is responsible for the implementation of the bill. This law introduces an authorization system for lenders, whereby companies may only lend workers if they have obtained authorization to do so. Companies can obtain authorization if they can submit a Certificate of Good Conduct (VOG) and pay a deposit. In addition, they are required to periodically submit an inspection report demonstrating their compliance with the relevant laws and regulations. The purpose of this law is to introduce an equal playing field for temporary employment agencies and to protect vulnerable workers, particularly migrant workers. Through this law, the government aims to tackle abuses in the temporary employment sector. The expected entry into force is planned for 1 January 2027. Starting on 1 January 2028, the Netherlands Labour Authority will enforce the admission requirement.

In addition, a ban on hiring and lending of temporary workers in the meat industry is being prepared. Only in the meat industry is there evidence of widespread and systematic abuse, with no improvement in sight. A temporary employment ban makes it possible to prohibit the hiring and lending of temporary workers in specific sectors. It will take approximately one year to develop and prepare a ban before it can come into effect. A new cabinet can decide whether the meat sector itself has shown enough improvement or if they will introduce the ban on temporary agency work in the meat sector.

- **Furthermore, GRETA considers that the Dutch authorities should:**
- **strengthen co-operation between labour inspectors, law enforcement officers, tax authorities, trade unions and other civil society actors, with a view to collecting evidence necessary for successfully investigating and prosecuting cases of THB for the purpose of labour exploitation;**

⁴ [Kamerbrief over reactie op rapport Nationaal Rapporteur Mensenhandel 'Rijke signalen, wisselende opvolging' | Kamerstuk | Rijksoverheid.nl](#)

- The Dutch government has implemented measures to improve the cooperation between different organisations involved in the fight against labour exploitation. Measures include the improvement of the cooperation between the public and the private sector and creating a legal basis for the exchange of data and other information.

- **adopt additional measures to strengthen the protection of labour migrants in the Netherlands;**

The Netherlands has taken significant steps to protect migrant workers in the Netherlands. The government commissioned an independent review of the situation and is working to implement the recommendations from the report of the Taskforce Protection of Labour Migrants. One key recommendation was the establishment of an admission system for temporary employment agencies to ensure these agencies comply with Dutch law. This legislation enters into force on 1 January 2027 and from 1 January 2028 the Netherlands Labour Authority will enforce the admission requirement. Besides that, the Dutch government is taking action to modernize the human trafficking legislation (Article 273f of the Dutch Criminal Code). The aim is to make the criminal law approach to human trafficking - including labour exploitation and serious harm to migrant workers - more effective and to improve the prosecution of offenders and the protection of victims. The new law creates more possibilities to protect vulnerable workers and penalize perpetrators who exploit the vulnerable position of migrant workers. This bill will soon be discussed in the Senate.

Furthermore, a new bill aims to provide greater control over how much, where, and for whom housing is being built. With the enactment of this law, municipalities will develop a public housing program, which must also specifically address the housing needs of targeted groups, such as migrant workers. In addition, the government is preparing a bill to ensure better rent protection for migrant workers. The government has also opened physical and mobile information points throughout the country for migrant workers. The parliament is being informed annually about the developments and progress that is being made with the implementation of the recommendations in the Annual Report on Migrant Workers⁵.

- **continue to improve the training and specialisation of labour inspectors in action against trafficking for the purpose of labour exploitation, including the constituent elements and specificities of the offence of human trafficking and the differences between it and offences under labour law (paragraph 164).**

The NLA organises and provides information meetings for inspectors and chain partners to raise awareness about labour exploitation. From the beginning of 2023, the training 'recognising signs of labour exploitation and 'serious disadvantage' is available to all inspectors of the NLA. In addition, the NLA is intensifying its approach to labour exploitation with the establishment of a department with detectives specialised in labour exploitation. In 2024 the detectives have been further trained on the topic of human trafficking.

⁵ [Jaarrapportage arbeidsmigranten 2024 nu beschikbaar | Arbeidsmigratie in goede banen](#)

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Measures to raise awareness of human trafficking and to discourage demand

- **GRETA considers that the Dutch authorities should adopt a more systematic prevention effort as regards trafficking in children and include the risks of THB, including online, in the learning objectives for students and teacher training programmes ((paragraph 174).**

In the National Action Plan action line 6 is dedicated to strengthening the position of underage victims. An important part of this action line is to consolidate existing research, supplement it and translate it into concrete recommendations that are subsequently widely implemented in practice. This is accomplished by identifying existing services and organisations involved and investigating the wishes and needs of victims (including in cooperation with experts with lived experience, care providers and victims themselves). This will lead to specific actions which can be put into operation directly with the parties concerned. At the same time training is used to focus on awareness and to encourage people to identify and report, with attention being paid to the online component, which is taking on an increasingly prominent role. This also includes creating awareness about human trafficking in schools. Where possible this will tie in with existing programmes on topics such as sexual exploitation, media literacy, financial knowledge, citizenship and crime and safety.

An important initiative is the portal 'Keerpunt'. This is an online portal where minors or young adults who are potential victims of criminal exploitation can ask questions, explain their situation or ask for help. The online chat makes it possible for them to do this anonymously. The group is being targeted through online outreach on social media platforms. It also functions as an information portal for parents, professionals or others who have come in touch with potential victims of human trafficking.

- **GRETA also considers that the Dutch authorities should continue making efforts to discourage demand for the services of trafficked persons, by adopting legislative, administrative, educational, social and cultural measures to discourage demand that fosters all forms of exploitation that leads to trafficking, in partnership with civil society, trade unions and the private sector (paragraph 175).**

In this context, under Article 273g, it is already a criminal offense to prosecute someone who purchases sexual services if the perpetrator knows or has a strong suspicion that the client is a victim of human trafficking. In addition, since July 1, 2024, the Sexual Offenses Act has been in force, which classifies sexual acts with sexually underage children who make themselves available for payment as grounds for increased punishment. This implements the objectives of the National Action Plan to take measures to discourage and deter clients who pay for sex with minors. Engaging in sexual acts with sexually underage children, and with sexually adult children who make themselves available in exchange for payment, was already punishable prior to the enactment of this law. In the National Action Plan specific actions are included which focus on clients

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who purchase sexual services from minors. Under action line 1, which focusses on creating broad awareness, a field lab is being established to examine how to discourage the demand for sexual services from minors. Furthermore, police and public prosecution service will organize at least one national day of action each year in the context of tackling the clients of human trafficking victims. In case a client/offender is being prosecuted for purchasing sexual services of minors or sexual exploitation, the Public Prosecution Service will explain in the media why someone is being prosecuted by explaining the motivation behind it.

- **Further, GRETA invites the Dutch authorities to examine establishing as a criminal offence the use of services of victims of trafficking, with the knowledge that the persons concerned are victims, for all forms of exploitation, as provided for in Article 19 of the Convention (paragraph 176).**

With the implementation of the revised EU-directive on human trafficking, the use of services where the victim is exploited to provide such a service will be criminalised. The user of the service needs to know that the person who is providing the service is a victim of human trafficking. This means that not only the purchase of sexual services from victims of human trafficking will be punishable but also for example services in the hospitality or beauty sector provided by victims of human trafficking if the consumer knows that the person providing the service is a victim of human trafficking. The bill to implement the EU-directive in the Dutch Criminal Code was sent to the House of Representatives on the 1st of October 2025.

Identification of victims of trafficking

- **GRETA urges the Dutch authorities to make further efforts to ensure that all victims of trafficking are identified as such and can benefit from the assistance and protection measures contained in the Convention, in particular by:**
 - **ensuring that, in practice, the identification of victims of THB, upon which assistance measures depend, is not linked to the prospects of the investigation and prosecution;**
See answer below.
 - **ensuring that the “slightest indication” criterion for identifying victims of trafficking is applied consistently by the police, KMar, NLA and OM, regardless of the purpose of exploitation, and that the recovery and reflection period is provided accordingly;**
See answer below.
 - **strengthening multi-agency involvement in the identification of victims of trafficking by formally recognising the role of specialised NGOs in the decision-making process leading to identification;**
 - Action line 3 of the National Action Plan consists of the investment in and working towards the more effective identification and protection of victims. Part of this action line is exploring the possibilities for separating the

identification of victims from the criminal investigation of human trafficking suspects. This includes previous pilots and studies, and extensive interviews with experts from various partner organisations. It also explores how other countries organise the process of identifying victims. In addition to this it is also being explored whether other relevant organisations could potentially play a role in the determination of victims eligible for the B8 scheme.

- **ensuring that there is a separation between immigration enforcement functions and labour inspectorate roles, and that labour inspectors prioritise the detection of persons working in irregular situations who are vulnerable to THB;**

The NLA and the Aliens Police (AVIM) are two separate organizations. The NLA has no legal obligation to report aliens to the Aliens Police nor are there working instructions prescribing this for labour inspectors. In case the NLA witnesses or receives signs or reports of labour exploitation, the NLA can handle these independently without contacting the Aliens police.

- **paying increased attention to the identification of victims of trafficking among asylum seekers and migrants, including by recruiting or otherwise engaging a sufficient number of trained staff, including interpreters and cultural mediators, to more effectively interact with migrants and asylum seekers. In this respect, reference is made to GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection (paragraph 185).**

The Central Agency for the Reception of Asylum Seekers (COA) offers two types of training: general training for all reception workers and tailored training for focal points in reception centres. The general training focuses on recognizing and reporting signs of human trafficking. In addition (and in preparation for the in-person training), there is a basic e-learning focusing on identifying signs of trafficking for all COA staff. The training for focal points teaches them to be the internal and external points of contact on the topic of human trafficking. The training includes networking with external organizations and conversation techniques in order to talk to victims of trafficking. In addition, an online e-learning course and webinar focusing on the sexual and criminal exploitation of young people was offered by the Red Cross and Fier. Fier is an NGO that specializes in supporting victims of (sexual) violence and exploitation. Besides training the staff, every COA location has one staff member specialised in human trafficking and human smuggling. The staff member can assist coworkers in initiating conversations with asylum seekers regarding the risks of human trafficking or when there are signs of human trafficking. They also maintain an external network to which they can refer potential victims. Presumed victims of trafficking who have applied for asylum keep their shelter and support from the COA.

- **Furthermore, GRETA considers that the Dutch authorities should continue and further strengthen their efforts to proactively identify victims of trafficking by reinforcing the capacity and**

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**training of all relevant officials, including at the municipal level
(paragraph 186).**

Improving the capacity and training of relevant officials to further strengthen the identification of victims of human trafficking is an important aspect of the Dutch human trafficking policy. The COA offers two types of training for their staff which includes a general training aimed at recognizing and reporting signs of human trafficking and a tailored training for focal points in COA locations. The tailored training includes networking with external organizations and conversation techniques in order to talk to victims of trafficking. Within the police, all first-line officers are trained in recognizing signs of human trafficking as it is part of the regular education program. Also every AVIM police officer working in the specialized team for tackling human trafficking is trained to be a certified investigator. The Immigration and Naturalisation Service (IND), provides human trafficking training courses to contact points and at asylum locations within the asylum field. Also tailor-made and general training is provided to the IND staff members. The National Labour Authority has a criminal investigations department of which the capacity has been expanded and all detectives receive special training. Finally, the Public Prosecution Service provides training to every public prosecutor working in the field of human trafficking. Some public prosecutors contribute to training courses on national (The Joint Training Institute of the Dutch Judiciary and the Public Prosecution Service) or European level (the European Judicial Training Network (EJTN) and the European Judicial Academy (ERA)).

Assistance to victims

- **Welcoming the availability of shelters for victims of THB with specific needs, GRETA considers that the Dutch authorities should further develop the assistance measures offered to victims of THB, and in particular:**

- **ensure that access to assistance for victims of THB is not made conditional on their willingness to co-operate in the investigation or prosecution;**

This relates to the separation of the identification of victims from the criminal investigation process. For an extensive answer on this, please see the answer to paragraph 185.

- **taking into account the increasing number of male victims and victims with multiple problems, guarantee a sufficient number of accommodation places for such victims;**
- In the last public tender for the Categorical Shelter for Victims of Human Trafficking (COSM) specific attention was given to accommodation facilities for men. There are 10 designated accommodation places for men, and an additional 30 accommodation places available for either men or women, depending on the needs at that given moment. With this new tender, which will be operational in 2026, the available number of places for male victims increases. For victims with multiple problems there are 31 places nationwide.

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- **ensure that shelters have sufficient human and financial resources to adapt their capacity to demand, regardless of which municipality is responsible for arranging the assistance measures (paragraph 195).**

There are several shelters which receive structural government funding. This funding makes it possible to adapt their capacity to demand, which was also a criteria in the most recent public tender for the Categorical Shelter for Victims of Human Trafficking (COSM). Under the Social Support Act municipalities are responsible for the shelters of Dutch victims and victims with lawful residence. They have to ensure sufficient human and financial resources and are responsible for the capacity. There are several budgets municipalities can use for the funding of these shelters. In case of shortages municipalities have the responsibility for adapting the capacity. Moreover, action line 3 of the National Action Plan consists of the improvement of the organisation of shelters for victims. The capacity and resources are part of this project.

Identification of, and assistance to, child victims of trafficking

- **GRETA urges the Dutch authorities to:**
- **develop a National Referral Mechanism for child victims of THB which takes into account the special circumstances and needs of child victims, involves child specialists and ensures that the best interests of the child are the primary consideration in all proceedings relating to child victims of THB and children at risk, including unaccompanied migrant children;**

In article 11 of the revised EU-directive on human trafficking member states are obliged to establish a National Referral Mechanism for all victims of human trafficking, including children. Related to this are the articles 11 and 14 of the same Directive which state that member states need to take specific measures to assist and support child victims of trafficking and shelters need to be equipped to accommodate the specific needs of children. The implementation bill of the new EU-directive is currently in the House of Representatives.

- **ensuring that relevant stakeholders (police, prosecutors, immigration officials, municipal authorities, youth care workers and teachers) take a proactive approach and increase their outreach work to identify child victims of THB, paying increase attention to online recruitment and exploitation;**

Article 18 of the revised EU-directive focusses on prevention and calls for member states to take appropriate measures such as education, training and campaigns in which special attention is given to the online dimension and children becoming victims of human trafficking. Member states have to do this in cooperation with relevant civil society organisations and other relevant stakeholders. In action line 6 of the National Action Plan a specific focus is given to strengthening the position of underage victims.

- **continue to take actions for reducing the risk of unaccompanied migrant children going missing from institutional care and to set up a system for tracking re-trafficked children, in order to understand the extent of this issue and react adequately**

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(paragraph 204).

The revised EU-directive on human trafficking also calls for member states to ensure that national child protection systems have to develop specific plans to prevent human trafficking, including of children in residential or closed-type institutions. This will also be included in the implementation of the EU-directive, which is currently in the House of Representatives.

- **GRETA also considers that the Dutch authorities should continue their efforts to improve the identification of, and assistance to, child victims of trafficking, in particular by:**
- **providing further training and tools to stakeholders on the identification of child victims of THB for different forms of exploitation;**

Member states have the obligation to improve the identification and assistance to child victims of trafficking. Based on article 18 of the revised EU-directive, member states have to take appropriate action to raise awareness and reduce the risk of children becoming victims of human trafficking. Actions that can be taken are information and awareness raising campaigns, research and education programmes, including the promotion of digital literacy and skills. This needs to be done in cooperation with relevant stakeholders including civil society organisations. The requirements of this article of the EU-directive complement on action line 6 of the National Action Plan which focusses on strengthening the position of underage victims. An extensive description of this action line is given in reaction on paragraph 174.

- **ensuring that access to a residence permit is not made conditional on the child victim's willingness to co-operate in the investigation or prosecution (paragraph 205).**

The answer to this recommendation is related to the separation of the the identification of victims from the criminal investigation of human trafficking suspects. An extensive answer to this can be found in the reaction on paragraph 185.

Recovery and reflection period and residence permits

- **GRETA once again urges the Dutch authorities to ensure, in compliance with the obligations under Article 13 of the Convention, that all possible foreign victims of trafficking, including those falling under the Dublin Regulations, are offered a recovery and reflection period and are able to fully benefit from all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention during this period (paragraph 213).**

Under the current policy framework all possible foreign victims of trafficking are offered a recovery and reflection period. This includes those falling under the Dublin Regulations, although the recovery and reflection period is shorter for them. They are offered a period of 30 days whereas other victims are offered 90 days. The policy framework for granting these periods to victims falling under the Dublin Regulations was changed in May 2023 pursuant to ECJ Case C-66/21 (*Eloignement de la victime de la traite d'êtres humains*) In this case the ECJ ruled all victims have the right to a

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recovery and reflection period, but EU Member States may strike a balance between the duration of this period and certain time periods laid down in the Dublin Regulations to ensure the correct relationship between those instruments and the preservation of their effectiveness. Following this case, the Netherlands changed its policy in order to offer all possible foreign victims of trafficking a recovery and reflection period, with a minimum period of 30 days in accordance with Article 13 of the Council of Europe Convention against human trafficking. With regard to the assistance mentioned in Article 12, paragraph 1 and 2 of the Convention, this is ensured in the Netherlands when victims are offered a recovery and reflection period.

- ➤ **Furthermore, GRETA considers that the authorities should ensure that victims of trafficking can fully benefit in practice from the right under Dutch law to obtain a renewable residence permit when they are unable to co-operate with the authorities, and to raise awareness of this possibility among relevant professionals and victims (paragraph 214).**

When it concerns the harrowing path, under the B8 procedure, then this is part of the Informative Interview.