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1. Introduction

The **SafeBorders - Strengthening Judicial expertise and Frontline support to combat Child Trafficking** project, co-funded by the European Union, aims to enhance the fight against child trafficking by empowering judicial authorities and frontline professionals across eight EU member states and Western Balkan countries. It seeks to foster cross-border cooperation, develop an AI-supported platform, and build a strong network of specialized prosecutors. The project places a particular emphasis on frontline actors, including police officers, port authorities, social workers, and healthcare providers, focusing on early victim identification and intervention at borders and within communities.

The current research activity is a preparatory step toward building the project's operational tools and interventions. Its primary objectives are:

- To gather insights into existing practices, challenges, and gaps in cross-border cooperation regarding child trafficking in Greece, contributing to the development of the Practical Handbook for Combatting Child Trafficking developed under Work Package 2 (D2.1).
- To identify the specific training needs of judicial authorities and frontline professionals regarding child trafficking, and
- To inform the development of training materials, guidelines, and the AI-powered collaboration platform.

The research was conducted in two distinct phases:

Desk Research:

The first phase, conducted in April and May 2025, involved a comprehensive review of existing European, international, and national legal frameworks relevant to child trafficking. Best practices, prior project outputs, and scientific literature were systematically mapped and analysed to define the current landscape of victim protection, cross-border cooperation, and data-driven judicial collaboration.

Field Research:

The second phase, conducted between May and September 2025, included the design and implementation of a targeted survey and semi-structured interviews with key stakeholders, which were conducted in July and August 2025. The field research engaged **37 respondents** in 11 individual interviews and 4 interdisciplinary and interagency Focus Group Discussions, encompassing judicial authorities (prosecutors and judges), police officers, social workers, public services personnel, experts from international organisations and NGO representatives. Respondents ranged in age from 28 to 58 years, with a balanced gender distribution (51% women, 49% men). Their professional experience varied from 4 to over 30 years in roles directly or indirectly connected to child trafficking detection, victim support, investigation and prosecution. Data collection emphasized confidentiality and anonymity, ensuring that no individual participant can be identified.

Stakeholders	Research Participants
Judiciary (Prosecutors and judges)	12
Police	9

NGOs and International Organisations	9
Public Services Personnel	7

2. Legal and policy framework

2.1. Existing legal and policy framework on child trafficking

The legal and policy framework addressing child trafficking in **Greece** demonstrates strong alignment with international and EU standards. The country is a party to all major conventions and has transposed relevant EU Directives, structuring a coherent legal framework regulating the criminalisation of human trafficking and the identification, protection and support of victims.

The landmark legal texts of reference on international and EU level are outlined below:

1. [Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime \(Palermo, 2000\)](#) Law 3875/2010 (Government Gazette A' 158/20.9.2010)
2. [Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography \(UN General Assembly, 2000\)](#) Law 3625/2007 (Government Gazette A' 290/24.12.2007)
3. [Convention on the Rights of the Child \(UN General Assembly, 1989\)](#) Law 2101/1992 (Government Gazette A' 192/02.12.1992)
4. [Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence \(Istanbul, 2011\)](#) Law 4531/2018 (Government Gazette A' 62/05.04.2018)
5. [Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse \(Lanzarote, 2007\)](#) Law 3727/2008 (Government Gazette A' 257/18.12.2008)
6. [Council of Europe Convention on Action against Trafficking in Human Beings \(Warsaw, 2005\)](#) Law 4216/2013 (Government Gazette A' 266/10.12.2013)
7. [Directive \(EU\) 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence](#) Law 5172/2025 (Government Gazette A' 10/29.01.2025)
8. [Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA](#) Law 4478/2017 (Government Gazette A' 91/23.06.2017)
9. [Directive 2011/93/EU of the European Parliament and of the Council of 13 December 2011 on combating the sexual abuse and sexual exploitation of children and child pornography, and replacing Council Framework Decision 2004/68/JHA](#) Law 4267 (Government Gazette A' 137/12.06.2014)
10. [Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims, and replacing Council Framework Decision 2002/629/JHA](#) Law 4198/2013 (Government Gazette A' 215/11.10.2013) [[Directive \(EU\) 2024/1712 of the European Parliament and of the Council of 13 June 2024 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims](#), not yet transposed.]
11. [Council Directive 2004/81/EC of 29 April 2004 on the residence permit issued to third-country nationals who are victims of trafficking in human beings or who have been the subject of an action to facilitate illegal immigration, who cooperate with the competent authorities](#) Transposed with Migration laws, initially L. 3386/2005, L. 4251/2014 and L. 5038/2023 (currently in force)
12. [Council Directive 2004/80/EC of 29 April 2004 relating to compensation to crime victims](#) Law 3811, (Government Gazette A' 231/18.12.2009) [Amended in 2014, 2018 and 2020]

Prosecution of Offenders

Regarding the investigation of the crimes, it is regulated by the Greek Criminal Procedures Code with specific provisions with regards to child victims' testimony and specific provisions on investigation of human trafficking crimes.

More concretely, human trafficking is explicitly criminalised under Article 323A of the Greek Penal Code (PC), which aligns with the definitions and scope outlined in Directive 2011/36/EU and the Palermo Protocol. Importantly, in cases involving minors, **no coercive or manipulating means need to be proven to establish trafficking**—only the act and purpose of exploitation suffice, in alignment with Article 2(5) of Directive 2011/36/EU.

Additionally, the Greek Penal Code includes provisions targeting related crimes affecting children and falling under the child exploitation notion, either profit-driven or for which the law foresees the issuance of an act of recognition as trafficking victims, as depicted below:

- **Article 323A** Sexual exploitation, labour exploitation, slavery and other forms of slavery, servitude, exploitation of begging and of criminal activities, (profit-driven) forced marriage, (profit-driven) removal of tissues, organs and cells, recruitment of a minor in armed operations
- **Article 339** Sexual acts against a minor or in their presence [It concerns minors under 15 years old]
- **Article 342** Commission, depiction or narration of sexual acts by an adult against a minor under their supervision or care, even temporarily
- **Article 348** Facilitation of sexual offences against minors through electronic means, and organization or promotion of travel for the purpose of committing sexual acts against minors
- **Article 348A** Child pornography
- **Article 348B** Grooming
- **Article 348C** Inducing or facilitating the participation of minors in pornographic performances, or organizing such performances
- **Article 349** Procuring and pimping of minors
- **Article 351A** Sexual acts with a minor in exchange for remuneration or other material benefits, including acts between minors instigated by an adult for remuneration, in their presence or that of another adult

It should be noted that some of the aforementioned offences do not fall strictly within the definition of human trafficking. Nevertheless, the national legislator intended to provide the same framework of protection afforded to victims of trafficking. For this reason, it was evidently decided that the victims of such offences should be officially recognised by prosecutorial order as victims of human trafficking. (art. 4 (α) L. 5038/2023)

Knowingly **using services** provided by a trafficking victim is criminalised under Article 323A(6) of the Penal Code.

Furthermore, **universal jurisdiction** is foreseen in art. 8(i) PC for human trafficking crime, while **extraterritorial jurisdiction** (348D PC) is foreseen for sexual crimes against minors (crimes under articles 339, 342, 348, 348A, 348B, 348C, 349 and 351A PC), covering the respective offences committed by a national abroad, even if such acts are not punishable under the laws of the foreign jurisdiction.

Although child trafficking is criminalised severely under Greek Penal Code, in accordance with international obligations such as the Palermo Protocol and Directive 2011/36/EU, the

exploitation in surrogacy is not explicitly included. **Illegal adoption** is criminalised under art. 360A PC per se and not as a form of human trafficking.

Protective measures foreseen in the Greek Criminal Procedures Code include the use of child-friendly interview techniques (Children’s Houses), closed court sessions, and avoiding direct confrontation between victims and offenders, in line with the United Nations Convention on the Rights of the Child (CRC) Article 40 and relevant EU standards.

The Greek legal framework for combating **money laundering** is largely shaped by international and European instruments. Key among these is the Council of Europe’s Warsaw Convention (2005), ratified through Law 4478/2017, which governs the laundering, detection, seizure, and confiscation of proceeds from criminal activity. Additionally, the EU’s Anti-Money Laundering Directives, particularly Directive (EU) 2018/843 (5th AMLD) and Directive (EU) 2018/1673 on the use of criminal law to combat money laundering—transposed into Greek law via Law 4816/2021—play a central role. Greek criminal law defines money laundering as an autonomous offense, yet closely interlinked with human trafficking, enabling the initiation of parallel financial investigations alongside trafficking cases. This legislative approach is in line with GRETA’s recommendations, which stress the need to disrupt financial flows and confiscate criminal proceeds in order to dismantle trafficking networks effectively.

GRETA however has urged Greek authorities to strengthen digital and financial investigations in child trafficking cases and to avoid relying exclusively on victim testimonies. Special investigation techniques should be employed systematically, and court proceedings must be conducted within a reasonable timeframe¹.

In the Greek context, the legal framework addressing **online crime** encompasses criminal law as outlined above, cybersecurity measures, and data protection regulations. Greece has transposed Directive 2011/93/EU through Law 4267/2014 as depicted above, thereby criminalising offenses such as online solicitation, the dissemination of child sexual abuse material (CSAM), and grooming. The Council of Europe’s Convention on Cybercrime (**Budapest Convention**, 2001), ratified via Law 4411/2016, provides the basis for international cooperation in cross-border investigations and data sharing.

A particularly pressing issue is the collection and transfer of **electronic evidence** (e-evidence), especially in cases involving online or tech-facilitated child trafficking and exploitation. Although the EU’s proposed Regulation on European Production and Preservation Orders for Electronic Evidence (COM(2018)225) has yet to be fully adopted, Greece is gradually aligning its legal procedures with the anticipated framework. This effort is supported by broader reforms related to the digitization of judicial cooperation (e.g., Regulation (EU) 2023/2844), ensuring that access to digital evidence is both effective for law enforcement and compliant with the General Data Protection Regulation (GDPR) and national Law 4624/2019.

Victim protection is firmly embedded in Greek law through the transposition of Directive 2012/29/EU via Law 4478/2017, which establishes minimum standards for the rights and support of victims of crime. Special emphasis is placed on children, who are entitled to individual needs assessments, access to appropriate support services, protection from secondary victimisation, and meaningful participation in criminal proceedings. Presidential Decree 233/2003 foresees specific rights for presumed victims of human trafficking. Both above

¹ Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings. (2023). *Recommendation CP/Rec(2023)02 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Greece*, adopted at the 32nd meeting of the Committee of the Parties on 16 June 2023. Strasbourg: Council of Europe.

mentioned legal instruments form a consolidated framework granting specific rights to trafficking victims.

Efforts to develop a **child-friendly justice system** are evident in Greek practice, in line with the Council of Europe Guidelines on Child-Friendly Justice and the Convention on the Rights of the Child (CRC). Initiatives such as the “Children’s House” model (regulated under Ministerial Decision 7320/2019) promote the use of specialised interview protocols, minimise repeated questioning, and ensure the involvement of trained professionals. Privacy, emotional safety, and informed participation are core elements of these procedures, particularly in trafficking-related investigations and trials.

National Referral Mechanism for the Protection of Victims of Human Trafficking (NRM)

The National Referral Mechanism for the Protection of Victims of Human Trafficking (NRM) was formally established by **Joint Ministerial Decision No. 30840/2016**. It is coordinated by the Office of the National Rapporteur on Trafficking in Human Beings (Ministry of Foreign Affairs) and operated by the National Centre for Social Solidarity (EKKA, under the Ministry of Social Cohesion and Family).

The NRM defines standard procedures for **Detection and identification** of presumed victims, with distinct reference to children where appropriate; **Immediate referral** to protection services with prior information and consultation but without requiring consent in the case of child victims and regardless of the initiation of criminal proceedings, in alignment with Articles 11 and 14 of Directive 2011/36/EU; **Monitoring of protection services** and social integration or dignified and voluntary repatriation according to the best interest of the child in child victims’ cases; **Data collection in regard to victims’ identification, formal recognition and protection** in alignment with Article 19a of the amended 2011/36/EU Directive.

Under this mechanism, children are considered victims **without needing to prove lack of consent to their exploitation**, and their referral is initiated by the detecting actor, in line with international child protection standards (CRC, Directive 2011/36/EU), in alignment with the recent amendments with Directive 2024/1712/EU. Article 11(4) of the amended 2011/36/EU Directive calls for **establishment of referral mechanisms** to ensure timely identification and assistance of child victims. While the Greek National Referral Mechanism is largely compliant with existing EU standards, the full transposition of Directive (EU) 2024/1712—amending Directive 2011/36/EU—requires the introduction of child-specific protocols and procedures. This legislative adjustment must be completed by 15 July 2026, in accordance with the directive’s transposition deadline.

The Greek authorities have developed a multi-agency approach in the NRM framework, involving all state and non-state actors (NRM actors mapping is available [here](#)) which provide services on the ground, as well as authorities, agencies and services which may encounter and identify trafficking victims and mainly: Law enforcement (Hellenic Police, Anti-trafficking Units and Sub-directorates for Minors’ Protection); Prosecutors and judiciary; the National Centre for Social Solidarity - “EKKA” (NRM operator coordinating victim services); Child protection services; Health services providers - Reception and Identification Service; Asylum Service; the Independent Labour Inspectorate Authority; NGOs and civil society organisations.

Key national policies relevant to child trafficking include:

- **The National Action Plan against Trafficking in Human Beings (2019–2023):** Includes specific reference to children through awareness campaigns, school-based prevention, and training for frontline professionals and applies the 4P’s structure. The next Action Plan

(2024–2028) is currently under development under the coordination of the Office of the National Rapporteur.

- **[The National Strategy for the Protection of Unaccompanied Minors \(2021\)](#)**: Dedicates a distinct pillar to the prevention of violence, exploitation, and trafficking through integrated care and early identification.
- **The Pending National Strategy on Child Sexual Exploitation and Abuse**: A draft has been submitted to the General Secretariat of Coordination (Presidency of the Government) and is awaiting finalisation.
- **[The Anti-Trafficking Strategy of the Ministry for Citizen Protection \(2021–2025\)](#)**: Addresses child trafficking through targeted actions on prevention, victim-centered protection, prosecution safeguards, and the training of professionals, with a focus on high-risk groups such as unaccompanied minors and Roma children.
- **[The National Roma Inclusion Strategy \(2021–2030\)](#)**: Seeks to address structural vulnerabilities that increase the risk of child trafficking, including school exclusion, child marriage, and forced begging, while promoting access to education, health care, and legal protection.

The above strategies aim among others to strengthen proactive identification of trafficking victims for labour and sexual exploitation among children, urging better coordination between NGOs, social services, and frontline agencies, especially in high-risk groups such as Roma children and unaccompanied minors, according to GRETA recommendations².

Special Procedures and Safeguards

More specifically, children identified as trafficking victims are entitled to the following rights for:

- Immediate access to accommodation and support (the unaccompanied children are detected and protected through the National Emergency Response Mechanism³, operated by the General Secretariat for Vulnerable Persons and Institutional Protection of the Ministry of Migration and Asylum), in alignment with the GRETA Recommendation for outreach activities to detect child victims.
- Child-friendly criminal procedures (e.g., Children’s Houses which follow the Barnahus model, in alignment with Article 15 of Directive 2011/36/EU and art. 20 of Directive 2011/93/EU).
- Guardianship for unaccompanied minors.
- Exemption from the requirement of cooperation with authorities for recognition as a victim and provision for reflection period for children from third countries; however, this has never been granted, although GRETA has emphasised the need to ensure that all foreign child victims are granted a recovery and reflection period when there are reasonable grounds to believe they are victims, regardless of their cooperation with law enforcement officials.
- Social and psychological support.
- Integration support.

² Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings. (2023). *Recommendation CP/Rec(2023)02 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Greece*, adopted at the 32nd meeting of the Committee of the Parties on 16 June 2023. Strasbourg: Council of Europe.

³ European Commission, Greece: National Emergency Response Mechanism, https://home-affairs.ec.europa.eu/projects/greece-national-emergency-response-mechanism_en

- Legal counselling and representation in criminal procedures.
- Medical Care.
- Material assistance.
- Child victims from third countries are entitled to a residence permit on the condition of their formal recognition as victims by the Public Prosecutor.
- Non-punishment on the condition of the nexus of their delinquency with the exploitative condition, in alignment with Article 18 of Directive 2011/36/EU, and
- Compensation (governed by L. 3811/2009, but never granted to a human trafficking victim).

It derives from the above that the Greek protection system aligns with Article 16 of Directive 2011/36/EU, which requires specialised support and durable solutions for unaccompanied child victims, including individual assessment and appointment of guardians or legal representatives without delay.

Inter-Agency Coordination

In Greece, coordinated national responses to child trafficking are supported through institutional structures and inter-agency cooperation mechanisms. The **Office of the National Rapporteur on Trafficking in Human Beings (ONR)** plays a central role in coordinating national anti-trafficking policy across multiple sectors. It collaborates with a wide range of actors, including law enforcement, the judiciary, the National Centre for Social Solidarity (EKKA), child protection services, and civil society organizations.

The [Greek National Referral Mechanism \(NRM\)](#), provides a structured framework for the identification, referral, and protection of trafficking victims, including children. The NRM fosters communication and cooperation between first-line responders, such as the police and NGOs, and supports coordination with international actors.

Although there is no child-specific anti-trafficking coordination body, these multi-sectoral mechanisms contribute to a unified response to child trafficking through joint case management, data sharing, and referral procedures.

Gaps and observations

- **Exploitation in surrogacy not explicitly criminalised as trafficking:** There is no specific legal provision criminalising exploitation in surrogacy as a form of trafficking in human beings. Related cases have been prosecuted under the category of labour exploitation, reflecting a legal gap in addressing this form of abuse.
- **Illegal adoption not classified as trafficking:** While illegal adoption is criminalised under Article 360A of the Penal Code, it is not legally recognised as a form of human trafficking.
- **Absence of a child-specific anti-trafficking strategy:** There is no dedicated national strategy focused exclusively on child trafficking, separate from broader anti-trafficking or child protection strategies.
- **National Cybersecurity Strategy lacks focus on child sexual exploitation online:** The [National Cybersecurity Strategy \(2020–2025\)](#) does not explicitly address online sexual abuse and exploitation of children as a distinct threat requiring targeted measures.
- **Lack of child-specific specialisation in investigations:** There are no specialised prosecutors or investigating judges assigned exclusively to child victim cases. Law

5028/2023 foresees specialised investigating judges for sexual offenses and human trafficking in Athens and Thessaloniki, but does not include child-specific specialisation.

- **Lack of consolidated judicial data on trafficking cases:** While the National Referral Mechanism (NRM) collects and publishes data on victim identification and support, Greece lacks a centralised system for judicial statistics on the prosecution and adjudication of trafficking cases. Efforts are [underway](#) to address this through the creation of a Judicial Statistics Processing Support Office as part of broader justice system reforms.

2.2. Effectiveness of the framework

Despite the solid legal foundation and alignment with international and EU standards, challenges remain in the effective implementation of Greece's anti-trafficking framework, particularly concerning children.

Strengths

- The existence of the **NRM**, coordinated by the Office of the National Rapporteur and operated by EKKA, provides a formalised, operational structure for identifying, referring, and protecting victims, including minors.
- Victims are entitled to comprehensive **services**, upon their identification by any front-line state or non-state actor and unconditionally, namely independently from the initiation of any penal procedures, including accommodation, legal aid, psychosocial support, and healthcare, delivered through a wide network of public institutions and NGOs.
- The victim-centered and rights-based approach—enshrined in the legal framework—ensures the best interest of the child is prioritised in all interventions.
- **Institutionalised training for public officials and justice professionals:** The National School of Judges regularly organises training seminars on child-friendly justice and human trafficking. In parallel, the National Centre for Public Administration and Local Government offers consistently available training on trafficking in human beings, accessible to all public servants across sectors.
- **Extension of limitation periods for child sexual exploitation offences:** Greek law allows the limitation period for initiating prosecution to begin only after the child victim reaches adulthood—one year for misdemeanors and three years for felonies. This aligns with Article 33 of the Lanzarote Convention and ensures victims have sufficient time to pursue justice. Although this safeguard was temporarily repealed in 2019, it was reinstated in 2021 through Article 26 of Law 4855/2021, reflecting Greece's commitment to protecting child victims of sexual abuse and exploitation.
- **Victim identification based on a low threshold of evidence:** Circular No. 7/2022 of the Deputy Prosecutor of the Supreme Court clarifies that, for the purpose of issuing a formal victim status decision, the prosecutor needs only to establish a reasonable presumption that the individual falls within the definition of a trafficking victim. Neither conclusive proof nor sufficient indications of a specific trafficking offence are required. Importantly, the procedure does not depend on a formal request or the victim's consent to be identified as such, ensuring a proactive and victim-centered approach to identification.
- **Harmonised implementation through regular NRM training:** The National Referral Mechanism (NRM) provides regular training sessions to frontline actors, ensuring consistent interpretation and application of victim identification and protection procedures across agencies and sectors.

- **Innovative emergency response mechanism for unaccompanied minors and vulnerable persons:** The National Emergency Response Mechanism (NERM), launched in 2021 by the Special Secretariat for the Protection of Unaccompanied Minors, replaced the practice of protective custody with child-appropriate emergency accommodation. Now operating under the General Secretariat for Vulnerable Persons of the Ministry of Migration and Asylum, NERM plays a growing role in the early identification and referral of unaccompanied child trafficking victims.

Limitations and Challenges

- **Limited territorial coverage of Children's Houses:** Children Houses operate only in the regions of Athens and Thessaloniki, despite being established by Ministerial Decision 7320/2019 in additional cities. Their limited availability challenges Greece's compliance with Articles 19–20 of Directive 2011/93/EU, which require specialised, child-centered assistance and reintegration measures across the country.
- **Intercultural mediation not integrated into child protection:** The mainstream child protection system, which includes child trafficking victims, does not provide for intercultural mediation, limiting effective communication and support for children from diverse backgrounds.
- **Psychiatric hospitalisation used as substitute for care placements:** According to a [2023 study](#)⁴, children are sometimes placed in psychiatric hospitals—often in adult units—not for clinical reasons, but due to the absence of suitable child protection placements. This results in prolonged stays following prosecutorial orders and has been criticised by the UN Committee on the Rights of the Child and national institutions as a violation of children's rights.
- **No specialised accommodation for child trafficking victims:** There is no dedicated shelter system for child victims of trafficking. Children are placed either in general child protection facilities or, if unaccompanied, in accommodation structures managed by the General Secretariat for Vulnerable Persons and Institutional Protection of the Ministry of Migration and Asylum.
- **Challenges in victim identification and investigation procedures:** GRETA⁵ has noted the need for systematic and timely identification procedures that are not solely dependent on victim complaints or cooperation. It also highlights the importance of interpreter availability and the use of evidence beyond victim testimony in investigations.
- **State compensation remains inaccessible to trafficking victims:** Although Law 3811/2009 provides for compensation to victims of violent crimes, in practice, no trafficking victim has received compensation under this framework, revealing a significant gap in implementation.
- **Gaps in structured, specialized training despite capacity-building efforts:** While various capacity-building initiatives exist, Greece lacks institutionalised, recurring training cycles for key professionals, such as police officers, prosecutors, social workers, and healthcare

⁴ Stylianidou, C. A. (2023). *Η ακούσια νοσηλεία ανηλίκων: Στοιχεία από την Εισαγγελία Ανηλίκων Αθηνών* [Involuntary hospitalization of minors: Data from the Athens Juvenile Prosecutor's Office] (Master's thesis, National and Kapodistrian University of Athens). <https://pergamos.lib.uoa.gr/uoa/dl/object/3349423/file.pdf>

⁵ Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings. (2023). *Recommendation CP/Rec(2023)02 on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Greece*, adopted at the 32nd meeting of the Committee of the Parties on 16 June 2023. Strasbourg: Council of Europe.

providers, as required under Articles 18a and 18b of the amended Directive 2011/36/EU. Mandatory, specialised training on early identification and trauma-informed care for child trafficking victims remains fragmented and insufficiently embedded in professional development systems.

Specific Gaps Identified by GRETA⁶

- **Labour exploitation appears significantly underreported:** Only 23 presumed victims were reported in 2019, 21 in 2020, and 39 in 2021, despite the presence of an estimated 10,000 undocumented workers in high-risk sectors like agriculture, construction, and domestic work.
- **Sustainable long-term funding for anti-trafficking activities is missing;** GRETA stresses the need for continued and reliable financing of the National Action Plan and protection structures.
- GRETA noted **gaps in identification and protection mechanisms specific to children**, including lack of specialised accommodation and limited trained professionals.
- Persistent **risk of trafficking for forced begging and sexual exploitation among Roma and migrant Unaccompanied Minors (UAM)** was highlighted.
- The number of **formally identified victims by prosecutors is dramatically lower** than presumed cases: 8 in 2019, 4 in 2020, and 7 in 2021.
- GRETA reiterates its concern over the **“low number of final convictions”** and urges Greece to address **gaps in investigation and prosecution** procedures to avoid impunity.
- Despite hundreds of presumed victims annually, **very few are officially recognised** by judicial authorities, impeding access to rights and protection (e.g., recovery period, residence permits, compensation).
- GRETA encourages Greece to improve **victim identification procedures**, especially ensuring they **do not depend on victim cooperation** with criminal proceedings

Ongoing Improvements

- The drafting of the new National Anti-trafficking Action Plan (2025–2029) promises renewed attention to child-specific dimensions of trafficking.
- A key development within the General Secretariat for Vulnerable Persons and Institutional Protection (GSVIP) of the Ministry of Migration and Asylum is the creation of a new Department for Victims of Violence and Human Trafficking, with the respective Presidential Decree still pending. By establishing a dedicated department, the GSVIP aims to streamline its operations, allocate resources more efficiently, and develop targeted policies in the area of the protection of third country nationals who are human trafficking victims. This structural change may also facilitate improved coordination with other departments and external stakeholders, potentially leading to more cohesive and effective strategies.
- Establishment of a structured national **guardianship** system for unaccompanied minors: In line with the National Strategy for Unaccompanied Minors, Greece adopted Law 4960/2022 (amending Law 4939/2022), introducing a comprehensive legal framework for the guardianship of unaccompanied minors, which is now operational. The law sets out clear

⁶ Group of Experts on Action against Trafficking in Human Beings (GRETA). (2023). *Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Greece (Third Evaluation Round)* (GRETA(2023)03). Council of Europe.

procedures, standards, and roles, assigning public prosecutors an independent role in guardian appointments, and authorising qualified legal entities as guardianship providers under contract with the Ministry of Migration and Asylum. Trained professionals (“guardianship-mandated persons”) are appointed to oversee up to 15 children each, ensuring their care, legal representation, and access to services. For 2024 and 2025, two civil society organizations have been selected to implement the nationwide programme, with capacity to serve up to 2,700 unaccompanied children, marking a major step toward institutionalised, child-centred protection.

Field research findings

Prevention and early identification

Stakeholders consistently underlined that prevention efforts remain **fragmented**. Police officers described outreach campaigns and school visits, often organised together with NGOs, that raised awareness and improved networking between professionals. They stressed that knowledge-sharing through seminars in Northern Greece created useful contacts for later cooperation. Yet several participants from both NGOs and justice services highlighted gaps: prevention fades once campaigns end, materials are not translated in the most relevant languages and routine follow-up is missing in places where risk evolves (after school, online, in peripheral neighbourhoods).

During one of the focus group discussions (FGD), police officers recalled visiting schools where even very young pupils already owned smartphones and had unrestricted access to social media. They noted that many children used their parents’ accounts, while parents themselves rarely attended awareness sessions. Prosecutors and NGO staff argued that prevention should be embedded in school curricula from primary level, particularly in IT classes, so children can recognise online grooming. At the same time, participants stressed the contrast between urban and regional areas: in smaller cities, coordination and communication between actors is easier, based in personal contact, whereas in Athens the contact is more impersonal and the coordination inconsistent.

NGO staff and prosecutors agreed that early identification is often unreliable. Health care services were described as a missed entry point for victim identification. Stakeholders stressed that hospitals and paediatric units should function as gateways for detecting child trafficking and exploitation, yet in practice these structures are not able to systematically carry out identification. Incidents arising outside working hours or during weekends were repeatedly mentioned, with children staying in police or hospital premises until their proper placement. Others recalled that after Bulgaria joined the EU and border checks ended, short-stay movements related to holidays or seasonal work became invisible in official datasets, further undermining early detection.

A prosecutor added that identification often occurs only at the stage of visible exploitation: *“What we usually discover is already the last stage—the exploitation. The rest is lost.”* Police officers also noted repeated encounters with the same children involved in begging, often under parental coercion, but with no protective follow-up: *“We bring them again and again to prosecutors, but nothing happens... custody should be removed if children are to be saved.”*

Protection and support of victims

NGO practitioners, case managers, and police officers all stressed systemic deficits. Trust is fragile, disclosure from children is often delayed, and specialised therapeutic support after identification is scarce or unavailable. One NGO representative described the system as

“putting band-aids on the wound,” relying on ad-hoc solutions such as NGO-funded medical exams in private clinics when state services operate in slow manner.

There were also strong contrasts between protection systems. Several participants observed that the dedicated framework for unaccompanied minors, supervised by the General Secretariat for Vulnerable Persons and Institutional Protection, operates more consistently, whereas native and EU-citizen children face greater gaps in placements and follow-up. This divergence was seen as a structural inequality within the child protection system.

The FGD participants confirmed these disparities. NGO staff underlined that formal victim recognition is often delayed, which in turn delays access to specific rights under the anti-trafficking framework (e.g., residence permits, non-removal safeguards, state compensation). They stressed the need for timely identification and consistent application of the non-punishment principle [Art. 59 Code of Criminal Procedures (CrPC) and Art. 323A(8) of the Penal Code (PC)]. A case cited involved a rescue in summer 2021 with victim recognition only after a first-instance conviction in January 2023. Under-resourced social services cannot sustain long-term monitoring, leading to children being placed back in family settings where exploitation may continue. An NGO representative recounted one case in which a child was transferred between hospitals, shelters and police departments for hours, and was forced to repeat their testimony up to six times in a single day due to the absence of trained psychologists. A judge added that children often remain in hospitals for months because of the shortage of placements, especially in Athens.

According to information provided by a prosecutor, who made reference to two cases of third-country nationals, the “social path” is applied in practice. Under this approach, a child can be formally recognised as a victim through a prosecutor’s order based on two opinions by psychologists or social workers, independently of whether criminal proceedings are initiated. This allows protection measures and support services to be activated even when a criminal investigation has not yet begun or when prosecution is not feasible.

Investigation and prosecution

Practitioners pointed to persistent frictions in how cases are initiated and developed. Police officers emphasised the operational value of charging suspects with lesser or administrative offences as a way to enable immediate intervention and to monitor repeat offenders. By contrast, prosecutors and NGO actors warned that, unless trafficking elements are clearly pursued and built into the case from the outset, they often collapse in court or “fall away” from case files as proceedings progress.

Prosecutors noted that procedures differ by region: in smaller towns child placements can be decided the same day, while in Athens or Thessaloniki heavy caseloads slow the process and make it more impersonal.

In terms of investigations, participants stressed that end-stage exploitation (street begging, a visible type of child labour) is documented, but financial flows and network organisers remain under-investigated. Prosecutors acknowledged that evidentiary thresholds differ across systems and delays in securing recordings or transcripts lead to repeat questioning. In Athens, backlogs in child-friendly interview scheduling due to understaffing were said to create a risk of losing contact with unaccompanied child victims before testimony is secured, whereas in Thessaloniki flexibility allowed such interviews to proceed in police premises with a child psychologist present, even after office hours.

FGD highlighted further weaknesses. Police officers described how evidence is often delivered in outdated formats (e.g. CDs) that are easily damaged or unusable in court. Prosecutors added that the justice system struggles with the scale of digital material—sometimes hundreds of gigabytes—without adequate servers or real-time access. A police officer explained: “*Criminal networks use technology more advanced than law enforcement... they use applications difficult to detect.*” Prosecutors also noted that frequent Penal Code amendments create uncertainty: “*We are crushed by the constant changes.*”

At the same time, participants cited examples of good practices. In Thessaloniki, cross-border cooperation with Interpol enabled the rescue and safe return of a child, illustrating the value of international frameworks. However, NGOs pointed out that the subsequent placement of the child with a relative in Greece revealed gaps in coordination between law enforcement and child protection procedures.

Inter-agency coordination and implementation

Coordination was described as highly uneven. In some cities, permanent inter-agency groups with fixed-membership, live placement registries and known focal points turned abstract mandates into functioning practice. Practitioners cited Thessaloniki as an example where these structures were embedded. Conversely, in other areas coordination remained ad-hoc, depending on personal phone calls rather than protocols. NGO representatives stressed that while collaboration exists, it is often person-driven rather than institutionalised. This leads to burnout among professionals who must fill systemic gaps without clear mandates.

CSO representatives characterised themselves as the connective tissue across health, justice and protection; escorting children to hospitals, accompanying them during interviews and arranging practical needs. Yet they also underlined the limits of project-based funding: their capacity to act consistently depends on temporary resources, and cannot serve as a substitute for state obligations.

FGD discussions reinforced this picture. NGO staff said that state-run social support for victims is practically absent, leaving CSOs to cover placements, escorts and emergency needs. In cross-border cases, NGOs like A21 acted as focal points, linking hotline reports, Greek authorities and international partners to secure referrals and transfers. However, they also described cases where communication between police officers and child protection practitioners collapsed, leading to children being placed in shelters without proper identification or follow-up.

3. Institutional landscape

3.1. Public institutions

<p>Ministry of Foreign Affairs</p> <p>Office of the National Rapporteur on Trafficking in Human Beings NRM supervision, National Anti-trafficking Action Plan drafting, Coordination of Actors, Organisation of Trainings for Law Enforcement, Collection of data, Research and awareness raising programmes, Annual reports, Representation to EU NRM's Network National Action Plan against Trafficking in Human Beings (2019–2023). <i>The next Action Plan (2025–2029) is currently under development</i></p>
<p>Ministry of Social Cohesion and Family</p> <p>National Centre for Social Solidarity (EKKA) NRM Operator, Emergency Shelters for Women victims of violence, Psychosocial Support, 24/7 Helplines (197, 1107-for children)</p>
<p>General Secretariat for Equality and Human Rights Counselling Centers for women victims of violence, Municipal shelters for women victims of violence and their children, Social Welfare Centers of Regions, Operates the Observatory for online gender-based violence among students, Operates the helpline 15900 for female victims of GBV National Action Plan for Gender Equality 2021-2025</p>
<p>General Secretariat for Social Solidarity and Combatting Poverty Leads national efforts to combat poverty and promote social inclusion, focusing on vulnerable groups such as the homeless, Roma, and persons with disabilities; Coordinates with EU and international partners, including UNICEF, to implement targeted policies and monitor the effectiveness of social integration programs. National Strategy for Social Inclusion and Poverty Reduction</p>
<p>Ministry of Labour and Social Security</p> <p>Greek Public Employment Service Interconnection of unemployed workers with the labour market; Training programmes for unemployed; Unemployed Workers Registry; Social Benefits for unemployed National Youth Employment Strategy 2021–2027</p>
<p>Ministry of Justice*</p> <p>Juvenile Probation and Social Assistance Services Assistance to Minors in conflict with the law</p>
<p>Autonomous Offices for the Protection of Minor Victims, (The Children's Houses) Conducting interviews with child victims of THB; Social and psychological support of child victims</p>
<p>National Judiciary School Capacity Building of judiciary</p>
<p>Office for the Collection and Processing of Judicial Statistics Collection, processing, and analysis of statistical data related to the judicial system *National Action Plan 2025 available only in Infographics</p>

Ministry of Citizen Protection
Hellenic Police (incl. anti-trafficking specialised Units and Sub-directorate for Minors' Protection) Law Enforcement; Operation of the helpline for crimes by and against minors (10201) Anti-Trafficking Strategy of the Ministry for Citizen Protection (2021–2025)
Office for Missing Persons Missing Persons Registry; Tracking Missing Persons
Ministry of Migration and Asylum
Reception and Identification Service Asylum Applicants' Reception and Accommodation
Asylum Service Adjudication of Asylum Claims
General Secretariat for Vulnerable Persons and Institutional Protection Protection of Unaccompanied Minors (including emergency and long-term shelters); Operation of National Emergency Response Mechanism (15107); Design of policies for the protection of vulnerable populations National Strategy for the Protection of Unaccompanied Minors (2021)
Ministry of Health
Health Service Providers (Hospitals, Health Centers, Local Health Units) Primary, secondary, and tertiary healthcare provision
National Public Health Organisation Training and research on public health protection
Institute of Child Health Research, clinical and laboratory services; Training of professionals in the field of child health
Health Units SA ("AEMY A.E.") Provision of public health services especially in migrants' pre-removal detention centres
Ministry of the Interior
Community Centers & Social Services of Municipalities Social Support
National Center for Public Administration and Local Government (EKDDA) Development of the human resources of Hellenic Public Administration and Local Government; Capacity building for public officers
Ministry of Infrastructure and Transportation
Hellenic Civil Aviation Authority (HCAA) Implementing aviation security regulations aligned with international standards (e.g., ICAO guidelines); Training of airport personnel; Promotion of coordinated response
Ministry of Education, Religious Affairs and Sports
Institute of Educational Policy (IEP) Supports the Ministry on matters related to primary and secondary education, educators' training, transition to higher education, post-secondary education, and addressing educational

inequality, school dropout, and early school leaving, aiming to ensure every child's right to education.
Ministry of Maritime Affairs & Insular Policy
Hellenic Coast Guard Maritime Law Enforcement; Search and Rescue (SAR); Port and Coastal Security
Ministry of Digital Governance
National Authority for Cybersecurity Prevention, detection, and response to cyber threats
Ministry of Economy and Finance
Anti-Money Laundering Authority (AMLA) Adoption and implementation of necessary measures for the prevention, detection, and suppression of money laundering from criminal activities
Independent Authorities
Labour Inspectorate To improve the labour relations, and the safety and health conditions at work, through inspections regarding the labour law provisions application; To reconcile employers with employees in cases of disputes; To inform employees and employers regarding the labour provisions; To investigate the employees' insurance coverage and the legality of their employment; To impose the prescribed sanctions in the context of its repressive action.
Ombudsperson Investigates individual complaints, legislative gaps, and administrative dysfunctions; Promotes equal treatment and monitors the rights of the child and other vulnerable groups in both the public and private sectors; establishes Adolescent Advisory Groups; Children's Ombudsperson Department
Greek National Commission for Human Rights (GNCHR) Independent advisory body to the Greek State for the promotion of human rights

Field research findings

Public Institutions' Role and Engagement in Practice

Public institutions in Greece, particularly prosecutors, judges, and specialised police units, play central but distinct roles in anti-trafficking work. Cases of neglect and abuse often enter the system through juvenile prosecutors, typically following anonymous reports or referrals from NGOs. Their mandate includes initiating investigations and ensuring immediate protective measures for children, yet this frequently collides with systemic gaps. One prosecutor described the dilemma starkly: *"If we proceed with arrests and bring you eight children, what will you do with them?... The state is unable to provide even the minimum protection."*

The judiciary, while responsible for adjudication, see relatively few trafficking cases reach the courtroom. A judge observed that proceedings often focus only on visible acts of exploitation rather than the full human trafficking chain: *"The rest of the trafficking chain is lost... prosecutions for trafficking itself are extremely rare."*

Police units have specialised mandates but overlapping responsibilities. The Anti-Trafficking Unit in Athens investigates cases involving unaccompanied minors from countries such as Egypt and

Pakistan, including *in flagrante* operations. Northern Greece units also report experience with organised begging and illegal adoption cases. Juvenile Divisions handle exploitation cases without clear elements of organised crime, but officers noted that *“the boundaries are blurred... often there is collaboration between Juvenile and Anti-Trafficking units.”* A police officer from Alexandroupolis stressed that repeat child offending, often linked to parental coercion in Roma communities—remains unaddressed: *“We bring them again and again to prosecutors, but nothing happens... I wish custody could be withdrawn so these children can be saved.”*

At the international level, prosecutors participate in the Eurojust framework, where the European Judicial Network on Organized Crime seeks to streamline cooperation: *“It is essentially a judicial network... to inaugurate collaborations, create ties, and make our work easier.”* NGO practitioners confirmed that in practice they often act as focal points in these international referrals, bridging Greek authorities, foreign partners, and hotline mechanisms.

Observed Strengths and Limitations

Examples of effective institutional engagement emerged in accounts of multidisciplinary coordination. A juvenile prosecutor highlighted the impact of convening social workers, hospitals, and municipalities: *“It showed how incredibly important it is to have all field actors at the same table.”* Similarly, a police Anti-Trafficking Unit of Northern Greece has extended their expertise to general officers through informal trainings, encouraging vigilance for child begging cases: *“We tried to ‘wake up’ colleagues... when they see a child begging, not to dismiss it, but to think something else may be behind it.”*

Yet limitations dominate the landscape. Capacity constraints in child protection facilities force children to remain for months in hospitals, a phenomenon observed mainly in Athens. Identification remains patchy. Prosecutors in regional areas reported several years of service with almost no trafficking indictments, underscoring systemic under-reporting.

Disparities Between Legal Mandates and Implementation

Although trafficking is clearly criminalised under Article 323A of the Penal Code, practitioners pointed to gaps between the law and practice. Exploitation of children in begging, for example, is rarely prosecuted as trafficking (felony) due to evidentiary challenges.

The introduction of Article 323B, criminalising the facilitation of begging separately as a misdemeanour, has in practice shifted many cases away from trafficking, creating jurisdictional ambiguities: *“(Article) 323B was introduced perhaps to separate some cases of begging... but it creates confusion.”*

At the same time, police officers noted a practical utility in Article 323B. Because it enables repeated arrests and minor prosecutions, it can generate patterns of evidence that support more serious charges: *“Through 323B you can start mapping the phenomenon, and with repeated arrests you may begin targeted investigation and eventually build a case file for felony under 323A.”*

Further disparities appear in child interviewing procedures. In regions without a Children’s House, examinations are carried out in police offices, often with only one child psychologist available for all cases and no child psychiatrist at all. As one prosecutor noted, *“The examinations take place at the police station... no video recording, sometimes only one meeting, contrary to what the law foresees.”* Although it is theoretically possible to request testimony at the Children’s House in Athens, in practice such requests are never made due to logistical constraints. The burden thus falls on a single professional — *“One person handles all the cases... it is restrictive, but it works.”*

Police officers also described technological barriers: cases increasingly involve only online traces, Instagram usernames or encrypted apps, rather than phone numbers. Members of the judiciary further stressed that without a wider social protection network for minors, legal safeguards remain unimplemented: *“There is no social protection network for minors and vulnerable families.”*

Training and capacity emerged as both a gap and an area of innovation. Prosecutors and police alike highlighted the scarcity of specialised staff.

Police officers in schools described prevention sessions where they reassure children that police are accessible *“any time, day or night.”* Prosecutors advocated for systematic integration of prevention into curricula, starting from primary school computer classes, so children can recognise online grooming.

Civil society organisations

Apart from the aforementioned state actors which provide services on the ground, all civil society actors engaged in services provision to human trafficking victims are part of the National Referral Mechanism for the Protection of Human Trafficking Victims (NRM) and are listed in the relevant mapping that the National Centre for Social Solidarity (EKKA) has conducted⁷.

The leading NGO in the area of support and protection of adult victims of human trafficking of all nationalities is the INGO [A21](#), which operates the helpline 1109, with available interpretation to more than 200 languages, offering accommodation vouchers, psychosocial support and legal aid and covering the whole Greek territory. [Solidarity Now](#) and [Greek Council for refugees](#) are also providing legal aid and psychosocial support to adult victims from third countries, but their services are project-based. [Diotima Centre](#) provides psychosocial and legal support to adult victims of GBV, including trafficking, in Athens and Thessaloniki. The [Community House “DAMARIS”](#) is operating a shelter in Athens for women victims of human trafficking. The [Union of Women Associations of Heraklion Prefecture](#) operates a helpline (8011116000) and operates a shelter in the island of Crete. The [International Organisation for Migration](#) provides integration support through a [project](#), to adult victims from third countries. [Arsis NGO](#) implements a [project](#) targeting the EU nationals who are victims of forced begging, providing psychosocial support and [supports](#) unaccompanied minors in precarious conditions, in cooperation with the National Emergency Response Mechanism (NERM) in Northern Greece. It runs two Youth centres in Athens and Thessaloniki, providing counselling and support to refugee children. The [Network for Children’s Rights](#) supports unaccompanied children in precarious conditions in cooperation with the National Emergency Response Mechanism (NERM) and covering central and southern Greece. The support includes legal aid for child victims of crimes. The [Smile of the Child](#) operates the national helpline 1056, for child victims of violence or at risk, providing psychological support. [O.U.R. \(Operation Underground Railroad\)](#) is a U.S.-based non-profit organization dedicated to combating sex trafficking and child exploitation globally. [“O.U.R. Greece”](#) has actively collaborated with local law enforcement and NGOs to dismantle trafficking networks and support survivors. It must be also mentioned that the [Greek Safer Internet Centre](#), known as [SaferInternet4Kids](#), is a national initiative established in 2016 under the Foundation for Research and Technology – Hellas (FORTH). Its mission is to promote the safe and responsible use of the internet, especially among children, teens, parents, and educators. The Centre operates through three main pillars: an Awareness Centre that provides educational resources and campaigns; [SafeLine](#), a hotline for reporting illegal online content; and a Helpline offering guidance on issues such as cyberbullying and harmful digital experiences. Actively involved in

⁷ National Centre for Social Solidarity (EKKA), Mapping table, available in English here: https://ekka.org.gr/images/KOINONIKON-PAREMBASEON/NRM_ACTORS.pdf

national and EU-level efforts, it organizes educational programs, media campaigns, and research initiatives. As a member of INSAFE and INHOPE networks and a recognized Trusted Flagger under the EU Digital Services Act, the Centre plays a vital role in fostering a safer digital environment in Greece.

Field research findings

Civil Society Organisations- Roles, Perspectives, and Practices

Civil society organisations (CSOs), including NGOs, international organisations, and field-based professionals, play a crucial role in Greece's anti-trafficking response. Their engagement spans prevention, victim identification, support and advocacy, often filling gaps left by the state. The interviews reveal a complex picture: dedicated work on the ground, important contributions to policy and collaboration, but also structural limitations, resource shortages and frustration with state inaction.

Prevention and Early Identification

CSOs consistently emphasised their frontline role in prevention and outreach. Street work in Athens and Thessaloniki was described as central to detecting potential victims, especially children involved in begging. As one NGO lawyer explained: *"We focus mainly on begging from Balkan countries, Romania, Bulgaria... through street work in Athens and Thessaloniki we have seen victims, or potential victims... sometimes entire families are exploited, sometimes children by their own parents"*.

Prevention also includes monitoring at entry points and in terms of support during the asylum process. Despite this proactive role, CSO staff highlighted difficulties in confirming suspicions. Identification remains fragile: *"In street work there is difficulty to really identify the victim... you may suspect but not confirm"*.

Victim Support Services

NGOs and international organisations provide direct support ranging from legal counselling and psychosocial care to referrals to the National Referral Mechanism (NRM). Staff reported dealing with cases of forced begging, family exploitation and unaccompanied minors. Yet even when victims are located, protection is fragile due to systemic constraints. A practitioner noted: *"Even in cases where victims are identified, the pathway to protection and reintegration is fragile because NGOs lack the means to accompany them throughout the process"*.

Some organisations provide day-care centres and shelters for children and families, often operating as the only point of consistent support.

Advocacy and Policy Engagement

Civil society actors participate in the National Referral Mechanism, international networks and EU-funded projects. These platforms allow them to raise concerns, monitor trends and advocate for systemic improvements. As one NGO representative remarked: *"(...T)he structures are understaffed and many times cases go unaddressed"*.

Engagement in European projects was highlighted as a means of building capacity and influencing national frameworks. CSO actors also provide technical expertise to state actors, delivering training sessions and guidance on child protection, trafficking indicators and psychosocial care.

Gaps in State Response

Across the interviews, CSO representatives were explicit about gaps in the state response. Central among these was the lack of adequate accommodation and child protection facilities. As one practitioner observed, children identified as victims often remain in hospitals for months due to the absence of specialised shelters. Others highlighted weak coordination and limited services for families in vulnerable situations.

The inability of state institutions to consistently follow legal safeguards also emerged as a recurring problem. NGOs noted that children's interviews frequently take place in police offices without specialised staff or appropriate recording, in direct contradiction of legal standards. As one lawyer summarised: *"The state is unable to provide even the minimum protection"*.

Collaboration with Public Institutions

Civil society actors described collaboration with state institutions as necessary but inconsistent. While NGOs participate in NRM procedures and sometimes in multidisciplinary meetings, many reported that coordination is heavily dependent on individual officials' initiative rather than institutional frameworks. *"We may refer cases, but unless the specific prosecutor or officer is committed, follow-up is uncertain"* (NGO lawyer).

At the same time, some good practices were acknowledged. Multidisciplinary protocols in Thessaloniki were praised as a model: *"It showed how incredibly important it is to have all field actors at the same table"*. Such initiatives demonstrate the potential of structured collaboration, even if they are not consistently replicated across the country.

Resource and Capacity Needs

Civil society organisations repeatedly underlined their own limitations, particularly in terms of funding and staff. Sustained street work, psychosocial support and long-term legal accompaniment require resources that are rarely secured. *"We cannot provide continuous follow-up, because resources are limited... staff burn out and cases remain open without resolution"* (NGO representative).

A recurring concern was the project-based nature of funding. Many interventions depend on EU-funded or short-term projects, which means that essential services are not guaranteed over time: *"Our interventions depend on projects... when funding ends, the services stop, even if the need continues"* (CSO practitioner). This discontinuity undermines trust with beneficiaries and prevents long-term planning.

At the same time, organisations stressed their intention to be complementary to the state, not replace it. As one participant emphasised: *"We are here to complement state services, not to replace them... but often the state leaves entire areas to NGOs"*. This perception highlights both the importance of CSO involvement and the risks of over-reliance on them in lieu of robust public provision.

Capacity needs also extend to interpreters, specialised child psychologists and trained legal staff. Without these, CSOs are unable to match the scale of demand, especially in Athens and Thessaloniki where child exploitation in begging is most visible.

Civil society organisations occupy a vital space in Greece's anti-trafficking field. Their contributions in prevention, victim identification, direct support and advocacy are evident, often compensating for state deficiencies. Yet their perspectives consistently highlight the structural gaps in the state response: insufficient protective facilities, weak institutional collaboration and inconsistent application of legal safeguards. At the same time, CSOs themselves face resource and capacity challenges, limiting their ability to provide sustained follow-up. Good practices, street

work outreach, multidisciplinary protocols, and participation in European networks, illustrate innovative ways forward, but without stronger state support and systematic collaboration, their impact remains constrained.

3.2. Coordination and cooperation

Greece demonstrates a strong institutional commitment to multi-agency coordination, with the main networks being the NRM and NERM.

The **National Referral Mechanism for the Protection of Human Trafficking Victims (NRM)** fosters cooperation among state services, international organisations (e.g., IOM, UNHCR), and NGOs through Standard Operating Procedures for all actors (available in the [NRM Handbook](#)); Periodic training and helpdesk for case-management; Regular communication and information exchange with all actors, also through thematic working groups; Victim-centered procedures ensuring continuity of care.

However, fragmentation and variability in local-level implementation persist, with some regions lacking consistent coordination mechanisms or referral capacity.

Since its establishment in 2021 with the support of UNHCR, the **National Emergency Response Mechanism (NERM)** has played a critical role in protecting unaccompanied minors (UAMs) in Greece, particularly those in precarious or homeless conditions. Evolving from the abolition of protective custody in 2020, NERM embodies a child-centred approach focused on urgent, appropriate accommodation and comprehensive support for vulnerable children. Central to NERM's effectiveness is its strong cooperation with a network of key actors. It works closely with the Hellenic Police, who immediately alert the Mechanism when unaccompanied minors without known residence are located, enabling rapid transfers to safe accommodation. This coordination is reinforced through direct links with designated police stations in Athens and Thessaloniki for prompt registration and referral. Additionally, NERM's operations rely on partnerships with NGOs (Arsis and Network for Children's Rights) that run mobile units conducting proactive street outreach, and with the International Organisation for Migration (IOM), which manages four emergency accommodation facilities offering holistic care.

Field research findings

Operational Cooperation Across Institutions

Stakeholders repeatedly highlighted the necessity of cooperation across justice, law enforcement, social services and NGOs in responding to child trafficking. In practice, however, experiences varied significantly.

In Thessaloniki, a juvenile prosecutor described the benefits of a multidisciplinary protocol that brought together prosecutors, hospitals, municipalities and NGOs: *"It showed how incredibly important it is to have all field actors at the same table."* This model was seen as enabling rapid responses, particularly in child placement, and was cited as an example of effective coordination. NGO practitioners confirmed that in Thessaloniki, flexible collaboration also allowed child-friendly interviews to take place in police premises with a psychologist present, even outside office hours.

At an international level, a prosecutor reported participation in Eurojust and OSCE networks, aiming to strengthen judicial cooperation on organized crime, including trafficking: *"It is essentially a judicial network... to inaugurate collaborations, create ties and make our work easier."* NGO actors added that in practice they often act as focal points in such cross-border cases in terms

of protection, transmitting hotline reports and accompanying referrals between foreign and Greek authorities.

The National Referral Mechanism (NRM)

Civil society and institutional actors repeatedly referred to the NRM as the main formal structure for coordination. It was stressed that the NRM could play a far more pivotal role. As one practitioner noted, it has the potential to provide the coordinating function that is currently missing, and is therefore a “key mechanism” for ensuring an integrated response.

The Need for Shared Platforms

A juvenile prosecutor underlined how crucial it would be to replace paperwork and repeated requests with direct digital access: *“Instead of having to ask and wait for documents, you should just open the computer and see the child’s testimony directly, or at least the video-recorded interview.”* This, she stressed, would both speed up procedures and protect children from being interviewed multiple times.

Participants also referred to the platform that had initially been managed by the Institute of Child Health and is now under the responsibility of the National Centre for Social Solidarity (EKKA). They emphasised how important it is for such a system to function effectively, not as a passive registry, but as an operational tool that can give the police officer who deals with a possible child trafficking case a complete picture of each child’s history and needs, ensuring continuity across institutions.

Personal Contacts versus Standardised Procedures: A recurring theme across stakeholders was reliance on personal networks rather than institutionalised systems. NGO representatives stressed that effective coordination often depended on “whether a specific prosecutor or officer is committed.” Police and prosecutors confirmed this practice, noting that personal trust and direct phone calls often substituted for formal procedures. While this flexibility was sometimes effective, it left coordination vulnerable to staff turnover and disparities in different geographic regions.

Differences Between Urban and Regional Contexts

Stakeholders also compared experiences in large cities and in smaller regions. In Athens and Thessaloniki, coordination was often described as more bureaucratic and impersonal, while in regional towns collaboration relied heavily on interpersonal relationships. A prosecutor explained: *“Here in rural areas, cooperation is not impersonal... everyone knows each other, which makes things easier.”*

Judicial-Prosecutorial Communication

Several participants stressed the importance of direct communication between judges and juvenile prosecutors. Regular exchange with juvenile prosecutors was seen as critical to ensure that child protection measures are consistent and that cases are not fragmented across institutions.

4. Child trafficking in context

4.1. Patterns and trends

Over the past decade, child trafficking in Greece has shown persistent and evolving trends, with a notable increase in recent years. According to the [2023 Report on Serious and Organized Crime by the Hellenic Police \(ELAS\)](#), Greece remains predominantly a **destination country** for victims of trafficking, while also serving as a **transit hub**, particularly for routes toward Central and Northern Europe. In fewer cases, it functions as a **source country**, with child victims trafficked within Greece primarily for **exploitation in begging** and, less frequently, for **sexual exploitation**.

Statistical Trends (2014–2023) – Police

According to statistics provided by the Hellenic Police:

Child trafficking cases remained relatively low until 2020 but have since increased significantly:

- **Cases investigated:** 2023: 37 - 2022: 26- 2021: 20- 2020: 9- 2019: 26- 2018: 28
- **Victims identified in 2023:** Total: 132 (98 adults, 34 children); In 2022: 37 victims (15 adults, 22 children)
- **Prosecuted perpetrators:** 2023: 143, 2022: 65, 2021: 60

Children comprised **approximately 25.76%** of all trafficking victims in 2023.

Main Forms of Exploitation

The **primary form of human trafficking** identified in Greece is:

- **Sexual Exploitation:** Depicted as most prevalent, involving 29 of the 37 cases in 2023; Victims—primarily girls—were exploited in illegal sex work establishments, massage parlors, and street prostitution; Traffickers often used deception, emotional manipulation (e.g., “lover boy” method), or threats to coerce victims. However, the data do not distinguish between minors and adults with regard to the form of exploitation; therefore, the prevalence of sexual exploitation likely reflects cases involving adult victims.
- **Forced Begging:** Typically involves children from the same family as the perpetrators, often with parental involvement or consent; Children were forced to beg in urban areas, near metro stations and shopping centres, under adult monitoring and control.
- **Forced Labour:** Though less common, cases exist where minors were trafficked into exploitative work conditions, mainly in agriculture or informal sectors.
- **Organ Removal:** There is one documented case (where the age of the victim is not defined) in 2023 linked to illegal surrogacy and egg harvesting. Victims, mainly women from Eastern Europe, were trafficked to undergo medical procedures in fertility clinics under coercive conditions.
- **Online Exploitation & Grooming:** Increasingly used both for recruitment and advertising of victims; social media and online platforms are exploited by traffickers for anonymity and broader reach.

Perpetrator and Victim Profiles

- **Perpetrators** (2023): 143 individuals charged; majority (93) were Greek nationals. Others included citizens of Albania, Bulgaria, Romania, Uzbekistan, Russia, and Georgia. 60% were men and 40% women, often from the same ethnicity as the victims.
- **Victims**: 90% were female; most commonly from Georgia, Greece, Colombia, Romania, and Moldova. Minors were frequently targeted due to vulnerabilities such as poverty, undocumented status, or dysfunctional family situations.

Modus Operandi and Criminal Networks

- **11 cases** in 2023 involved organised transnational criminal networks. These were highly structured with clear division of roles: recruitment, transportation, housing, and exploitation. 78% were homogeneous in nationality; most were regional or national in scope, with only a small number operating transnationally.
- **Control Mechanisms** included: Psychological manipulation, debt bondage, confiscation of documents, restricted movement, and forced drug use. Physical violence was minimised to avoid detection; psychological coercion was more common.

Shifts Over Time

- **Shift from physical to psychological control** methods to avoid detection.
- **Use of digital platforms** for recruitment and client solicitation has increased.
- **Focus on organised groups**, with larger-scale operations dismantled in recent years, often involving the exploitation of minors for sexual services or begging.
- **Increased victim identification** may reflect improved detection and police efforts rather than a spike in trafficking alone.

Another important source of information is the National Referral Mechanism (NRM) annual reports, which have been published since 2019. It is important to clarify that the data submitted to the NRM is based on the personal accounts of presumed victims and is often not linked to criminal proceedings, particularly in cases where the crime occurred abroad, either in the victim's country of origin or during their migration journey. Nevertheless, the patterns identified in these reports are largely consistent with those recorded by the police.

In 2024, the NRM [recorded](#) 99 new cases of child victims of trafficking (60 girls-40 boys), of whom 62 were unaccompanied minors — 50 girls and 49 boys. Children were trafficked primarily for Labour exploitation, Exploitation of begging (EU nationals including local children only), Criminal exploitation, Sexual exploitation, Forced marriage (occurred before entering Greece), Recruitment in Armed Operations (occurred before entering Greece).

Children originated mainly from Africa: Egypt (13) Somalia, Sierra Leone, Guinea, Ethiopia, and Morocco; Greece (36); Asia: Pakistan and Syria; Eastern Europe (EU): Romania and Bulgaria.

Trafficking occurred both within Greece and transnationally. Notably, 47 children were exploited in Greece, with many cases involving forced begging of children of Greek and EU origin.

The report also highlights the use of technology by perpetrators which was recorded mainly during the recruitment stage, such as the initial approach to victims, with reference to

acquaintances and/or communications through online communication applications such as Telegram and WhatsApp, as well as social media platforms like TikTok, Facebook, and Instagram.

Field research findings

Emerging Trends, Methods, and Detection Gaps

Forced begging remains prevalent, with **labour exploitation** rising. Practitioners across sectors reported that while sexual exploitation historically dominated the picture, labour exploitation and forced begging of minors now feature more prominently in day-to-day operations. A prosecutor participant of a focus-group discussion added that children are also **exploited to commit criminal acts** (e.g., carrying drugs or facilitating other offences).

Family- and community-based exploitation is common in street settings. NGO street-work teams described repeated encounters with children in begging situations where parents or caregivers direct - and profit from the activity, at times involving entire family units. They noted that their focus is mainly on detecting exploitation through begging linked to Balkan countries, such as Romania and Bulgaria, and that through street work in Athens and Thessaloniki they have encountered victims or potential victims of exploitation. In some cases, entire families are involved, while in others children are exploited by their own parents.

Organisations working with unaccompanied minors (UAMs) described a re-emergence of cases in **agricultural** zones (e.g., strawberry fields) and reports of long hours in small **retail** (mini-markets), with withheld wages in debt bondage situations and document retention. For unaccompanied boys, notably from Egypt and Pakistan, recruitment into agricultural, construction, or market work frequently occurs through adult co-nationals met en route or upon arrival; many have worked from very young ages before migrating. Routes mentioned include Libya and United Arab Emirates (UAE)–Turkey–Greece routes.

Exploitation linked to assisted reproduction/ **surrogacy** is an emerging concern. A senior prosecutor highlighted a notable increase around surrogacy, stressing how the “grey zone” between legal and illegal arrangements can facilitate trafficking and considering the baby as a victim as well: *“Because surrogacy is legal under certain conditions, many practices can be made to ‘fit’ within that framework — and in effect, this can amount to human trafficking.”*

Recruitment tactics and the role of technology

Stakeholders repeatedly noted the use of social media and messaging apps for first contact, grooming, and the circulation of images. A child-protection actor associated rising cases of online sexual exploitation with expanded social media use among minors; methods reminiscent of the “lover boy” pattern were flagged.

An officer from the Anti-Trafficking Unit described organised groups’ routine use of apps (e.g., Telegram) and stressed that perpetrators’ use of technological innovations is often ahead of law enforcement capabilities.

Interviewees described grooming dynamics where children, including Greek minors, fail to recognise exploitation; they are persuaded by promises of money or help, or misled by fake/curated online identities. Practitioner accounts of deceptive profiles and children’s limited digital literacy came up repeatedly. Both police and NGO practitioners reported that initial contact with minors is increasingly taking place online. Children are approached through social media,

messaging platforms, or gaming environments and then channelled into various forms of exploitation.

A prosecutor working on island arrivals noted that many alleged acts occur abroad, making investigation difficult; victims may lack identifiable details or were relocated (due to granted protection, or onward movement) before a full deposition. Cases often stall or are archived for unknown perpetrators.

Recent cases discussed by practitioners suggest the presence of boys originating from countries such as Pakistan and Egypt who may be involved in labour exploitation in sectors such as agriculture or small retail. Identification often occurs through indirect indicators and sustained communication with frontline organisations, including situations where children share their location to enable outreach or intervention by the competent authorities. At the same time, fear of retaliation against family members in the country of origin may hinder disclosure and cooperation with protection mechanisms.

Stakeholders lamented fragmented records between police, prosecutors, social services, and NGOs; accounts are not visible across institutions. Practitioners (including prosecutors) argued for shared digital access (e.g., video-recorded testimony should be made available to authorised actors) and cited the need for an operational platform beyond a statistical registry.

Regional, demographic and contextual differences

In Athens and Thessaloniki, teams reported higher volume and street visibility of child begging, with seasonal shifts (holiday periods; tourist areas in summer). One NGO described different “mindsets” among exploiters in the two cities: in Thessaloniki, more cautious/ detached behaviour when approached; in Athens, a stronger sense of impunity. Street teams linked increased presence of certain child-begging groups to ease of movement (e.g., Bulgaria/Romania–Greece), with opportunistic seasonal relocation to tourist areas.

Recurrently mentioned were UAMs (particularly Egyptian boys in recent flows) for labour exploitation and Roma/ Balkan family contexts for forced begging.

Beyond begging and labour, stakeholders spoke of children used in petty criminality (e.g., theft, street-level offences) or more serious crimes (e.g. drug trafficking, smuggling), infrequently recognised in time as trafficking exploitation. More specifically, an interviewee stated that juvenile involvement in criminal groups should be examined more closely. Current reporting often counts minors as part of adult criminal groups without clarifying their actual role or level of agency. Further analysis would help determine whether these minors are acting as equal participants or whether they may be present in situations of vulnerability, coercion, or exploitation.

4.2. Victim profile and groups at risk

Based on the 2023 [NRM Annual Report](#) and the [Hellenic Police Report on Serious and Organised Crime](#), the typical profiles of child trafficking victims in Greece reveal consistent trends shaped by gender, age, nationality, socio-economic vulnerability, and migration status.

Gender and Age

In 2023, **100 child victims** were registered in the NRM, with **62 identified as unaccompanied minors**. Among all child victims:

- **60% were girls** (60 girls vs. 40 boys).
- Among unaccompanied minors: 37 were girls and 25 were boys.
- Most victims were aged **13–17**, with **12 children under 6** also identified, including one child under 12 accompanied by a minor relative.

Nationality and Ethnicity⁸

Child victims originated predominantly from:

- **African countries:** Somalia, Sierra Leone, and Democratic Republic of Congo.
- **Asian countries:** Pakistan, Afghanistan, Bangladesh, and Syria.
- **EU countries:** Romania and Bulgaria.
- **Greece:** Notably, **35 Greek children** were identified as victims of exploitation, mostly in **begging and sexual exploitation**, indicating domestic trafficking.

Migration Status

A large share of child victims were **asylum seekers**, especially among unaccompanied minors. Specifically:

- **56 unaccompanied minors** had pending asylum applications.
- **Only a few (5)** lacked legal documents entirely.

This reflects a strong intersection between **trafficking and irregular migration**, where children on the move, especially without guardians, are at heightened risk.

Socio-Economic Background and Vulnerability

The majority of victims were in **precarious socio-economic conditions**, often characterised by poverty, lack of education (most unaccompanied children had never attended school), homelessness or unstable living conditions and migration without legal support.

Recruiters often exploited these vulnerabilities using deception or abuse of power, especially for **begging and forced marriage**. In many cases, **family members were directly involved**, particularly in begging cases where parents or relatives orchestrated the exploitation.

Forms of Exploitation

Data from both Hellenic Police and the NRM highlight the main forms of child trafficking: **Sexual (including online) exploitation**, predominantly affecting girls, often linked to prostitution or pornography); **Forced begging** which affects both genders; frequently involves parental involvement; **Labour exploitation**, especially boys, in sectors like agriculture and undocumented work; and **Criminal exploitation**.

Notable Trends Over Time

- A **25.76% increase in child victims** was recorded by Hellenic Police in 2023 compared to 2022.

⁸ It should be noted that the Roma indicator is not included in the NRM referral form.

- Both Hellenic Police and NRM data confirm the predominance of **begging**, followed by **sexual exploitation** at a considerably lower rate.
- Increased **use of psychological coercion** over physical violence for control.
- **Recruiters often share nationality** with the victims, facilitating trust and manipulation.

Field research findings

Roma Children

Several practitioners identified Roma children as particularly vulnerable, especially to forced begging and exploitation with the involvement of family members⁹. Street workers and prosecutors described patterns where entire families are involved, with children mobilised daily for income generation. While visible in public spaces, such cases are often prosecuted under lesser offences, leaving them underrepresented in trafficking statistics.

Unaccompanied Minors (UAMs)

Unaccompanied boys, especially from Egypt, Pakistan, Afghanistan and Sudan, were repeatedly mentioned as highly exposed. Police and NGO actors described how many arrive having already worked from a young age, often recruited by older co-nationals into agricultural labour, construction, or petty trade. One professional noted: *“They come here with the expectation of working; some already worked in Libya, or passed through the UAE or Turkey... the risk of exploitation is constant”*.

Children in Institutional Care

Respondents expressed concern that children in institutional care facilities are often overlooked in anti-trafficking frameworks. NGOs noted that these children face secondary vulnerabilities, such as insufficient supervision, limited psychosocial support and risks of going missing. Practitioners suggested that official statistics underestimate the overlap between institutional care and trafficking risk, as disappearances or suspected exploitations are not systematically recorded as trafficking cases.

Children with Disabilities

Practitioners noted that children with disabilities (including physical disabilities, mental health conditions, or developmental disabilities) are deliberately targeted in forced begging schemes, as exploiters capitalise on public sympathy. An NGO worker described: *“It is common to see children with disabilities begging, often accompanied by an adult... it raises suspicion that there is organisation behind it.”* Here, vulnerability intersects with poverty, family exploitation and ethnic marginalisation, intensifying risk and leaving children invisible both socially and institutionally.

Children from Families in Unstable Situations

Several interviewees linked trafficking risk to unstable family environments, including poverty, neglect, domestic violence, or parental incapacity. Such instability rarely acts alone: it intersects with economic deprivation, minority status, or disability, compounding vulnerability. Children in these contexts may appear officially as “neglected” rather than trafficked, leading to underestimation in data and gaps in intervention.

The Role of Social Media

Practitioners stressed that even children without classic markers of vulnerability are exposed through digital environments. Online grooming and deceptive profiles mean that any child with internet access may be at risk. As one professional emphasised, “*Today the easiest way to approach a child is online... you don’t need them to be ‘vulnerable’ in other ways for them to be deceived.*” This highlights that in addition to structural vulnerabilities, social media themselves create new vulnerabilities, widening the outreach to potential victims.

4.3. Factors leading to vulnerability

Based on the **2023 National Referral Mechanism (NRM) Annual Report** and the **Hellenic Police Report on Serious and Organised Crime**, several **socio-economic and systemic factors** have been identified as key contributors to children’s vulnerability to trafficking in Greece. These factors often intersect, creating complex risk environments for both national and migrant children.

1. Poverty and Economic Hardship: Poverty is a core driver of child trafficking. Many victims, including Greek and migrant children, come from economically disadvantaged backgrounds. According to both NRM and Police data, traffickers exploit families’ financial desperation by offering false promises of work, education, or better living conditions. For example:

- In cases of forced begging and sexual exploitation, families or caregivers sometimes **actively participate** in trafficking due to dire financial need.
- Children are trafficked into exploitative labour (e.g., agriculture or domestic work), especially **boys from migrant backgrounds**, as a way to support their families financially.

2. Family Instability and Abuse: Family dysfunction, neglect, or abuse greatly increase children's susceptibility to exploitation. The NRM report notes:

- Cases involving **forced begging** often occur **within the family unit**, with parents or close relatives directly exploiting children.
- Children who are abandoned, live with extended family, or are in informal care arrangements (such as squats or unsafe shelters) are more easily targeted by traffickers.

3. Lack of Access to Education: Limited access to education is both a **symptom and driver of vulnerability**. A significant number of child victims, particularly unaccompanied minors, have **never attended school**, making them more likely to be exploited and less able to seek help.

4. Displacement and Migration Status: Unaccompanied and separated children, particularly those in migration contexts, are among the most at-risk groups:

- The majority of unaccompanied child victims registered in the NRM were asylum seekers or in the process of regularising their status.
- Migration routes often expose children to **multiple trafficking risks**, including exploitation en route or in reception/transit facilities.
- Traffickers exploit the **lack of adult protection**, as well as the children's **limited understanding of their rights**, especially during irregular migration.

5. Gaps in Child Protection Systems: While Greece has established mechanisms like NERM and the NRM, systemic weaknesses still exist:

- **Delays in identification and referral**, due to overwhelmed services or lack of specialised training, can allow trafficking to go undetected.
- **Insufficient coordination** between child protection services, law enforcement, and asylum systems can leave at-risk children invisible to authorities.

6. Digital Exposure and Online Recruitment: The rise in online exploitation has introduced new risks:

- Traffickers increasingly use **social media platforms** to recruit or advertise victims, especially in cases of sexual exploitation.
- The Police report highlights the use of **online grooming tactics** such as the “lover boy” method, where traffickers form emotional bonds with girls online before coercing them into trafficking situations.
- Online advertising of “services” complicates detection and expands traffickers' reach.

7. Discrimination and Marginalisation: Children from **ethnic minorities**, especially Roma communities and migrant children from Sub-Saharan Africa or South Asia, face additional barriers.

Field research findings

Real-World Risk Drivers

Structural Barriers — “Understaffed Everywhere”

Practitioners across roles emphasised the depth of resource shortages at every level of the system. Social services are understaffed and unable to act preventively or provide early intervention. As a child protection expert noted: *“There is no social protection network for childhood. Services are completely understaffed.”*

A senior police officer highlighted the mismatch between caseload and personnel: *“It’s great to say I’m specialised here or there, but cases can outnumber us — we can’t argue with the math.”*

Without Children’s Houses, proper child-friendly interviewing is rarely applied; protections exist in law but not consistently in practice. Cooperation often depends on personal networks and trust rather than standardised procedures. An officer explained that *“the boundaries between Juvenile and Anti-Trafficking units are not clearly delineated”*, which can create uncertainty over which unit should take responsibility for a case. Also in such cases, proceedings may not advance, particularly when acts occurred abroad, perpetrators remain unknown, or victims relocate.

Practitioners repeatedly identified social media and messaging apps as the primary entry point for recruiting adolescents. However, a prosecutor emphasized that this medium alone is not sufficient for the completion of the trafficking chain; the interaction must transition into the real world in order to fully entrap the victim.

Police and NGOs reported exploitation embedded in family or community networks, particularly forced begging where adults collect proceeds, keeping the activity hidden from trafficking prosecution.

Prosecutors and CSOs noted minors coerced into petty offences, a trend growing in practice but rarely recognised in trafficking statistics.

5. Practical aspects of anti-trafficking efforts

5.1. Detection, investigation and prosecution

Based on the **2023 NRM Annual Report**, the **Police Report on Serious and Organised Crime**, and the **GRETA 2023 evaluation**, the following summary outlines how child trafficking cases are typically identified and handled within the Greek justice system, covering procedures for detection, investigation, and prosecution.

Identification of Child Trafficking Cases

Child trafficking cases in Greece are most often identified through:

- **Frontline professionals** and actors who participate in the **National Referral Mechanism (NRM)**, including NGOs, shelters, hospitals, and the police. These actors submit reports to EKKKA, which manages the NRM, however this procedure is **anonymised**, meaning that EKKKA would not refer cases to the law enforcement. However, any actor which identifies a trafficking case is obliged to notify the prosecutor or the police, according to the Greek Criminal Procedures Code (mainly art. 37, 38 and 40) and the NRM Standard Operating Procedures (SOPs).
- **Presumed victims** are identified based on indicators outlined in NRM SOPs; **informed consent** is required for registration in the NRM unless the victim is a child, in which case consent is not needed.
- **Mobile units** (e.g. under NERM for unaccompanied minors) actively trace vulnerable children, especially those in precarious or street situations.

However, **formal identification** (a legal status required for access to rights such as residence and compensation) must be provided by a **public prosecutor**, which creates delays and often results in fewer formally recognised victims compared to presumed victims.

Criminal Procedures: Investigation and Prosecution

Legal Framework

- **Article 323A of the Greek Criminal Code (CC)** criminalises all forms of trafficking, including child trafficking, incorporating various forms of exploitation: sexual, labour, begging, criminal activity, organ removal, and forced marriage.
- The **Code of Criminal Procedures (CCP)** includes specific provisions for victim protection, such as non-punishment (Art. 59 CCP), and the return of assets seized during investigations (Art. 373 CCP).

Detection and Investigation

- Investigations are conducted by **specialised anti-trafficking units** within the Hellenic Police and often involve **prosecutorial orders**. However, some cases without indication of organised crime may be investigated by the Minors' Protection Police Department. Local police stations are competent also for investigating child trafficking cases, asking often for guidelines from Police Headquarters or Anti-trafficking Sub-directorates of Athens and Thessaloniki.

- Child victims are prioritised for protection and must be referred to child protection services and shelters, but GRETA noted gaps in rapid identification and safe accommodation.
- Victim formal identification requires in practice victims to come forward and engage with authorities ([Greta 2023 report](#), para. 158).

Judicial Process and Outcomes

- According to Police data, **143 traffickers were prosecuted in 2023**, related to 65 in 2022, with **34 minor victims** among the 132 total victims identified in trafficking cases that year.
- Prosecutions often focus on **sexual exploitation**, which is the predominant form of child trafficking. Forced begging and labour exploitation follow.
- **Only a fraction** of presumed victims is formally identified and lead to convictions.
- It must be noted that Greece lacks a centralised system for judicial statistics on the prosecution and adjudication of trafficking cases. Efforts are [underway](#) to address this through the creation of a Judicial Statistics Processing Support Office as part of broader justice system reforms.

Institutional Guidelines and Training

- The **Prosecutor of the Supreme Court** of Greece (“Arios Pagos”) has issued multiple circulars (in [2018](#), [2020a](#), [2020b](#), [2022](#)) providing guidance to prosecutors from regional areas, on the **identification and protection of trafficking victims**, including minors.
- The **National Judiciary School** now includes victims’ rights in its [curriculum](#). Special [training](#) has been provided to judges, prosecutors, police, and child protection professionals.

Despite improvements, challenges persist:

- Low levels of formal recognition of child victims of trafficking have been observed at the prosecutorial level.
- **Delays** in victim status recognition limit access to protection and legal remedies.
- **Low conviction rates**, due to burdens of proof and reluctance of child victims to participate in trials.
- **Limited territorial coverage of Children’s Houses**: Children’s Houses operate only in the regions of Athens and Thessaloniki, despite being established by Ministerial Decision 7320/2019 in more cities. Their limited availability challenges Greece’s compliance with Articles 19–20 of Directive 2011/93/EU, which require specialised, child-centred assistance and reintegration measures across the country. Thus, the child-friendly character of the justice system is not fully ensured, exposing child victims to the risk of secondary victimisation.
- **Insufficient inter-agency coordination** in early identification and care pathways.

According to [GRETA](#), it is important to:

- Strengthen the **specialisation of prosecutors and judges** in THB cases.

- Ensure that identification is **not conditional on cooperation** with law enforcement.
- Improve **data collection** and disaggregated reporting to monitor case outcomes.

Field research findings

Justice System and Investigations

Stakeholders described persistent obstacles in identifying cases and securing evidence. Most child cases come to light at a late stage, during visible exploitation in public spaces or through targeted operations by police or NGOs, rather than through systematic referrals from hospitals, schools, or paediatric services.

Evidence collection was described as fragile: child-friendly interviews are not always available promptly, interpreters are difficult to mobilise outside working hours and children are interviewed repeatedly especially where the Children's House is not in place. Several participants highlighted problems with media handling, including interview files arriving on CDs or USB sticks that fail in court, inconsistent formats, and transcription backlogs that weaken the evidentiary chain.

On coordination between law enforcement and judicial authorities, participants said practice varies significantly. Where prosecutors are involved early, they help plan interviews, issue preservation orders and align investigative steps with protection, reducing duplication and strengthening admissibility. In other places, hand-offs are slower: charges and investigative measures are taken late, and elements of the trafficking crime are harder to sustain.

Further experiences of professionals who participated in the research activities confirmed that gaps are even more acute outside major urban centres. Prosecutors and police officers described how, especially on weekends, there are no child psychologists available for interviews and no interpreters on call, leading to long delays or repeated questioning. Several stakeholders underlined that current criminal procedure rules and available infrastructure have not kept pace with the realities of exploitation through digital means, leaving practitioners "a step behind" traffickers' in the use of technology.

Regarding the investigation of networks and financial flows, practitioners mentioned that most cases stop at the immediate exploitation stage. Proving benefit in child-begging or labour scenarios is sometimes straightforward, but mapping associates, tracing money, or linking incidents across regions was described as inconsistent and capacity-dependent.

Law enforcement participants in the focus groups added that the shift to online recruitment has fundamentally changed investigative needs. Many children have no SIM cards and communicate solely via Wi-Fi and encrypted messaging applications, leaving investigators reliant on complex digital traces. Police officers noted that although new analytical tools are available, there is insufficient training and staff to manage encrypted apps, cloud storage, or extremely large volumes of seized data. As a result, crucial leads are often delayed or missed. Prosecutors also acknowledged that they cannot always access digital material directly and depend on intermediaries to transmit files, which slows down proceedings and risks further evidence gaps.

Practitioners also reported cases where the sharing of location data by a child enabled authorities to intervene and identify multiple victims of exploitation. In one such case, coordination between frontline organisations, the competent prosecutor and law enforcement led to an operation that resulted in the rescue of several trafficking victims, including both minors and adults.

On the treatment of child victims in the justice system, stakeholders agreed that the child-friendly interview model in the Children's Houses works well when applied: a single, recorded interview led by a psychologist reduces re-traumatisation and yields testimony usable later. The main difficulties include regional coverage and prompt response.

5.2. Victim support

Child victims are entitled to protection unconditionally, upon their identification by any field actor (no formal recognition by a prosecutor, neither initiation of criminal proceedings is required).

Among the 99 child victims recorded in 2024 to NRM received services such as Social support (62), Accommodation (57 cases), Medical care (52), Psychological support (48), Support in appointing a guardian (43), Material assistance (42), Greek and other language courses – vocational training (27), Legal counselling (23), School enrolment (21), Support in legal proceedings (20), Legal representation (13), Job search support (7) Job placement (2).

Field research findings

Quality and Accessibility of Services

Stakeholders described state social support as insufficient in practice, a situation being deteriorated by the delays in the issuance of official victim recognition. Without that status, children were reported to lack access to healthcare, residence permits and protection from deportation, leaving CSOs to cover urgent needs ad hoc.

Participants highlighted **placement shortages**, with prosecutors noting that children can remain in hospitals for extended periods due to a lack of available spaces in child protection facilities, a problem observed particularly in Athens.

NGO accounts described **repeated narratives** of abuse within a single day, when children were moved across police departments, hospitals and shelters in the absence of trained professionals on duty.

Stakeholders reported **delays after working hours and on weekends**, with children held in police or hospital premises until the appropriate professionals were available.

Prosecutors and police also emphasised **procedural and technological bottlenecks** (e.g., recordings/transcripts not secured promptly; evidence on CDs that are damaged or unusable in court), which slowed down protection and increased the likelihood of repeated questioning.

Where **multidisciplinary coordination** was embedded, responses improved. In Thessaloniki, interagency tables with fixed-membership and known focal points were cited as turning mandates into practice; stakeholders also described flexibility to conduct child-friendly interviews at police premises with a psychologist present after office hours.

5.3. Prevention

Greece's National Action Plan against Trafficking in Human Beings (2019–2023) addressed prevention in part through activities such as the training of frontline professionals, public awareness campaigns, and human rights education in schools. The Office of the National Rapporteur is currently developing the new National Action Plan for 2025–2029, offering a promising opportunity for enhanced alignment with Article 19b of the amended Directive 2011/36/EU. Additionally, the National Strategy for the Protection of Unaccompanied Minors

outlines key child protection measures under Pillar 3, which focuses on prevention and effective protection from all forms of violence, exploitation, and abuse. A further development is the National Strategy against Child Exploitation and Abuse, which is nearing finalisation, following the submission of its draft by the relevant Working Group to the General Secretariat of Coordination at the Presidency of the Government.

In Greece, a variety of national and local prevention measures are in place to address child trafficking, with efforts focusing on **education, public awareness, and outreach to at-risk communities**. These initiatives are implemented by public authorities, NGOs, and international organisations, often in collaboration with schools and local communities.

Educational Campaigns and School-Based Programmes

Numerous awareness-raising initiatives target students, educators, and school communities. These include, according to [GRETA](#):

- **School-based educational programmes** aimed at informing students about trafficking risks, safe online behaviour, and human rights.
- **Interactive activities**, including workshops, seminars, and theatre performances designed to engage young audiences and build resilience.
- **Teacher training programmes** to help educators identify warning signs and support vulnerable children.

Exemplary prevention initiatives:

1. Between December 2024 and January 2025, four specialised workshops were organised by the General Secretariat for Vulnerable Persons and Institutional Protection of the Hellenic Ministry of Migration and Asylum across four unaccompanied girls' shelters in Attica, targeting primarily girls from Somalia, as well as Syria, Sierra Leone, India, and the Democratic Republic of Congo. Facilitated by a child protection trainer and with available interpretation in participants' languages, the sessions aimed to empower participants by raising awareness about healthy versus unhealthy relationships, online safety, grooming tactics, and the development of personal safety plans. Girls were encouraged to identify trusted support networks and to avoid isolation. The workshops used visual aids to stimulate discussion and foster peer support. ([GSVPIP Annual Report 2024](#), p. 86)
2. The first educational conference titled "*Vulnerability of Migrants/Refugees and Child Protection*" was organised by the General Secretariat for Vulnerable Persons and Institutional Protection of the Hellenic Ministry of Migration and Asylum in collaboration with the Department of Early Childhood Education at the University of Thessaly and the NGO A21. Additionally, an event focused on *Human Rights Protection and the Fight Against Human Trafficking* was also held by the above Secretariat in cooperation with the same university department and A21, engaging over 200 students from local schools in a series of interactive workshops. ([NRM Report 2024](#), p. 90)

Despite the diversity of programmes, there is **no overarching national strategy or centralised coordination**, which results in a **lack of consistency and long-term impact evaluation**. Initiatives tend to be **project-based**, with limited sustainability once funding ends.

Public Awareness and Outreach Initiatives

Greece also hosts public campaigns to raise general awareness of human trafficking (Annexes of the NRM Reports [2022](#), [2023](#), [2024](#)):

- **Awareness events**, such as public talks, exhibitions, and themed days (e.g., EU Anti-Trafficking Day), often supported by local authorities or civil society.
- **Media campaigns** using television, radio, and social media to disseminate anti-trafficking messages and promote available support services.
- **Theatrical performances** aimed at sensitising broader audiences, including families and youth, to the signs and dangers of trafficking.

Certain efforts aim to reach vulnerable populations, such as:

- **Unaccompanied minors and asylum-seeking children**, often through shelters or community-based NGOs.

Field research findings

Prevention and Early Identification

Across interviews and focus group discussions, participants described prevention as highly uneven in both reach and effect. NGO professionals who conduct street work emphasised that prevention is visible in city centres of Athens and Thessaloniki, as well as in specific hotspots, when **outreach** is routine and predictable. They underlined that repeated presence in the same places makes them recognisable to local youth, and that this continuity is essential for trust-building. At the same time, they warned that one-off campaigns quickly lose impact and do not keep pace with how and where risks develop. Several interviewees stressed that prevention does not follow children into the contexts where exploitation evolves — particularly after school, during evening hours and online.

Police representatives confirmed that, in practice, many cases of children still come out through street operations. They mentioned the role of the Minors' Protection Departments of the Hellenic Police in Athens and Thessaloniki, which have steady presence in squares and public spaces where adolescents gather. According to these officers, this visible presence is not only a preventive measure but also helps in establishing trust with potential victims and identifying cases of child begging. In Thessaloniki, anti-trafficking officers described specific initiatives to train and inform other police units across Northern Greece on how to identify potential victims of exploitation in the context of begging.

Despite such measures, interviewees repeatedly pointed to systemic barriers that prevent early identification. NGO staff noted that children contacted through hotlines are often difficult to trace or may disappear quickly, making immediate follow-up essential. They stressed that repeated outreach is usually needed, as minors do not easily build trust. Prosecutors and social workers highlighted the delays caused by the absence of child-friendly procedures outside regular hours.

Stakeholders also pointed to gaps in risk assessment and early intervention. Several practitioners noted that adolescents approached online rarely identify themselves as victims, and their hesitation to speak makes it difficult to build a case based on their testimony. Participants emphasised that in Athens specifically, delays in scheduling child-friendly interviews at the "Children's House" due to workload and understaffing increase the likelihood that children disengage before evidence is secured. By contrast, in Thessaloniki, police described greater flexibility, with forensic interviews sometimes conducted at police premises in cooperation with child psychologists when a case is identified outside the official hours of the Children's House.

Despite these positive examples, participants stressed unmet needs that persist: the absence of a truly 24/7 child protection system, the shortage of interpreters and child psychologists after work

-hours and the lack of simple, widely used risk-assessment tools that could help non-specialist professionals act on early signs.

A FGD participant stated that in regard to the labour exploitation of minors, prevention efforts should also focus on facilitating pathways that combine education, vocational training and access to lawful employment. The more flexible and accessible these integration pathways are the more likely it is that children will remain within formal systems rather than resort to informal or exploitative forms of work. Strengthening such opportunities can therefore act as an important preventive measure against labour exploitation, begging or involvement in delinquent activities.

6. International cooperation mechanisms

Greece's engagement in coordinated national responses to child trafficking is supported through its participation in EU-wide initiatives such as the European Multidisciplinary Platform Against Criminal Threats (EMPACT). EMPACT facilitates collaboration among law enforcement, judicial authorities, child protection services, NGOs, and international partners to combat serious and organised crime, including trafficking in human beings.

Greece maintains active cooperation with INTERPOL in combating transnational human trafficking networks, particularly those involving sexual exploitation. A notable example is the "Amaryllis" operation, a significant law enforcement initiative undertaken by Greek authorities in 2023 to dismantle an international criminal network involved in human trafficking and sexual exploitation. This operation targeted two interconnected criminal organizations operating primarily in Athens, which were engaged in the sex trafficking of women, mainly from Latin America. The victims were lured to Greece under false pretenses and subsequently forced into prostitution.

The operation was a collaborative effort involving the Hellenic Police, INTERPOL, the national police force of Spain, the U.S. Homeland Security Service via the U.S. Embassy in Athens, and non-governmental organizations such as "O.U.R. Greece" and "A21". The coordinated action led to multiple arrests and the identification of several victims, highlighting the importance of international cooperation in combating human trafficking.

The Greek legal framework strongly supports and necessitates interagency and cross-border cooperation, particularly in the investigation and prosecution of child trafficking and online exploitation. Multiple ratified conventions and transposed EU directives mandate structured judicial, police, and technological collaboration. This includes participation in joint investigation teams (JITs), mutual recognition of judicial decisions, cross-border access to electronic evidence, and alignment with pan-European referral mechanisms and victim protection standards.

Field research findings

International cooperation

Stakeholders offered extensive reflections on how international cooperation functions in practice, highlighting both strengths and enduring barriers. Several interviewees referred to concrete experiences of cross-border cooperation with neighbouring states. Through the National Referral Mechanism, Greek actors had engaged in bilateral collaboration with Albania and Bulgaria. One participant described these initiatives as "very useful," but stressed that success depends on knowing each system well and following procedures carefully: *"To have good results, one must know the other country's system and have solid reference persons."* Others confirmed that when such bilateral links are in place, cooperation produces tangible outcomes, but they also underlined the need for consistency and predictability.

Police and judicial officials differentiated between cooperation within the EU and with third countries. Inside the EU, they cited tools such as the European Investigation Order and the European Arrest Warrant as facilitating cooperation, since trafficking is on the list of offences that bypass the condition of double criminality. Minor frictions remain where national legislation diverges, for example, conduct that constitutes an offence in one country but not in another—but overall, harmonisation helps. One prosecutor emphasised: *"Within the EU, I do not see a major issue... human trafficking is recognised everywhere as a crime."*

By contrast, working with third countries was described as more difficult. Law enforcement interviewees noted that cooperation is “tighter” with Europol countries, with fast information exchange and responsive judicial authorities (citing examples such as Lithuania, Bulgaria, Cyprus, Germany, and France). With non-EU states, Algeria, Tunisia, Libya, Turkey, progress was said to be much slower and more uncertain.

Difficulties may also arise in cases where information on child sexual abuse material is received through international cooperation but the victim cannot be identified. As noted by a participant in a focus group discussion, when the age of the person depicted cannot be clearly established, uncertainty regarding minority status may significantly complicate the criminal qualification of the case and hinder its prosecution.

The role of EU-level platforms and networks drew mixed views. Some participants had extensive experience using Europol channels and described them as providing direct, official points of contact. They mentioned liaison officers stationed in embassies as critical when urgency requires formal, recognised channels. One official explained that embassy-based liaison officers can act quickly in emergencies because they are considered official authorities.

The use of Joint Investigation Teams (JITs) was highlighted as an underused tool in Greece. One prosecutor mentioned previous experience with a Joint Investigation Team (JIT), observing that the mechanism could be employed more often, but remains outside the routine toolbox of many professionals. Compared to countries such as Bulgaria and Romania, where hundreds of JITs have been established in recent years, Greece was seen as lagging behind.

Victim repatriation was described as especially vulnerable to breakdowns in cooperation. Practitioners noted that documentation, guardianship and consent procedures are often more time-consuming to resolve than the criminal investigation aspects of a case. While coordination with embassies or liaison officers has at times helped accelerate the process, predictable and reliable contacts abroad remain the exception rather than the rule.

On financial investigations, interviewees observed that while benefit is clear in certain scenarios, following money across borders remains extremely challenging. They said cooperation with financial intelligence units abroad was inconsistent and often delayed, leaving the organisational dimension of trafficking underdeveloped.

7. Conclusion

Greece has made important progress in aligning its response to child trafficking with European and international standards. The existing legal framework, the National Referral Mechanism for the protection of victims of human trafficking (NRM), the National Emergency Response Mechanism for the Protection of Unaccompanied Minors (NERM), and the gradual roll-out of the Children's House model constitute significant foundations. Where these procedures are activated with genuine inter-agency cooperation between prosecutors, police, hospitals, social services, and NGOs, children are transferred quickly to safe accommodation, receive prompt medical examinations, and provide a single recorded interview that reduces secondary victimisation.

However, field research findings demonstrate that implementation remains uneven and often dependent on personal networks and the geographical territory. Victim identification is frequently delayed, especially in cases of labour exploitation, while vulnerable groups such as unaccompanied minors, Roma children, institutionalised children, and children with disabilities remain at high risk. Cases involving minors within criminal groups should be examined with caution, as current classifications may treat them as equivalent members alongside adults without clarifying their actual role or level of agency. Further analysis is recommended to determine whether these minors are acting as equal participants or may instead be present in situations of vulnerability, coercion, or exploitation.

Services are concentrated in urban centres and rarely operate 24/7, leaving evenings and weekends as "blind spots." Hospitals and paediatric services, though in frequent contact with vulnerable children, are not yet reliable entry points into protection. Weak information-sharing, the shortage of specialised placements, and the lack of systematic data on judicial outcomes further undermine the effectiveness and credibility of the protection system. Health care services should play a stronger role in the early identification of children and families in situations of vulnerability. Universal points of contact with public paediatric services, such as regular infant and child health monitoring through public centres, can support early detection and preventive intervention.¹⁰

Emerging forms of exploitation through digital platforms and transnational mobility complicate detection and monitoring. The absence of sufficient intercultural mediation and the practice of prolonged stays in children's hospitals due to lack of appropriate care placements undermine a child-centred approach. Moreover, Greece lacks a dedicated national strategy exclusively targeting child trafficking, as well as specialised shelters/ accommodation structures for child victims.

A particularly positive development is the progress achieved in the protection system for unaccompanied minors (NERM), which combines a clear legal framework, specialised services, and coordinated emergency response. Stakeholders consistently identified this model as more coherent and reliable compared to other child protection domains. For this reason, it should be recognised as a benchmark and extended horizontally to all children (both Greek and other EU nationals) at risk of exploitation or trafficking, with equivalent resources, specialised staff, and stable nationwide structures. Such an expansion would ensure universality of protection, reduce inequalities between categories of children, and safeguard equal access to rights and care.

¹⁰ An interviewee made reference to an approach existed in Greece through the PICPA (Patriotic Institution for Social Welfare and Perception) until 1998, which operated medico-social and paediatric centres providing similar services for children and families and enabling regular contact between public services and households.

As underlined by a Juvenile Prosecutor however, institutional care cannot provide sustainable solutions for children. Instead, long-term protection must prioritise foster care and family-type placements, ensuring stability, attachment, and healthy development. Institutionalisation should only be a temporary, last-resort measure, with a clear pathway to permanent family-based solutions.

The combined desk and field research thus point to a clear direction for improvement: (a) ensuring reliable protection at all times and in all regions through the expansion of Children's Houses and integrated rapid-response teams; (b) engaging the health sector as a true gateway to protection with simple screening tools and direct liaison lines; (c) strengthening early identification and prevention through universal points of contact with public services, particularly primary healthcare and paediatric services, ensuring that children and families are regularly seen by trained professionals who can detect early signs of vulnerability and refer cases promptly to protection mechanisms (d) institutionalising stable, predictable inter-agency coordination with common protocols and secure digital platforms for information exchange; (e) developing a child-specific national strategy against trafficking that guarantees consistency across regions and actors (f) shifting away from reliance on institutional care by prioritising foster care and family-type placements, ensuring that institutionalisation is only a temporary, last-resort measure; (g) strengthening structured cross-border cooperation with neighbouring countries through clear referral procedures, designated contact points, and mutual understanding of national child protection systems, building on existing cooperation practices in the region.

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