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NOTE

From : The Dutch Delegation
To : Working Party on General Matters including Evaluations (GENVAL)
Subject : Putting Rantsev into Practice
A conference on strengthening multidisciplinary operational cooperation
to fight trafficking in human beings
16-18 April 2013, Amsterdam, The Netherlands
Conference report

Introduction

The conference Putting Rantsev into Practice on strengthening multidisciplinary operational cooperation to fight trafficking in human beings, organized by Poland, Cyprus and the Netherlands, took place from 16-18 April 2013 in Amsterdam, the Netherlands. It was aimed at developing and strengthening (cross-border) multidisciplinary operational cooperation against trafficking in human beings and focused on cooperation between a selection of the relevant partners in the fight against THB. Participants also discussed the positive obligations formulated by the European Court of Human Rights in its judgment in the case Rantsev v. Cyprus and Russia¹, including those to put in place a ‘comprehensive approach’ to fight THB, going beyond investigation and prosecution to include prevention of trafficking and protection of victims, and to cooperate effectively with the relevant authorities in other states in THB investigations.

¹ 10 January 2010 (Application no. 25965/04).

The conference was attended by representatives of all member states, nine other countries, the relevant EU agencies, the Commission and the Council Secretariat. Seven different organizations were invited to attend from each member state: public prosecution services, police, border agencies, immigration services, labour inspectorates or criminal investigation services in this field, local governments and ministries or coordinating bodies in the fight against trafficking in human beings.

In order to make the conference as relevant as possible for all member states (MS), the subjects of the workshops were chosen based on their suggestions and suggestions received from the EU agencies and the Commission. For the same reason, an effort was made to give as many MS as possible a role in the 34 workshops that were held. In the end, representatives of twenty MS (in addition to five EU agencies and ICMPD) either led a workshop or gave a presentation. This document aims to give a summary of the discussions that took place in the workshops, based on the reports that were drawn up of the workshops. The conclusions have been clustered along the main themes that emerged during the conference. These are:

- multidisciplinary operational cooperation in general,
- the individual roles of the different professions invited to the conference in that cooperation,
- other possible partners in multidisciplinary cooperation,
- raising multidisciplinary awareness and providing multidisciplinary training,
- multidisciplinary exchange of information,
- multidisciplinary or cross-border cooperation regarding victims and
- structures and projects to support multidisciplinary cooperation.

Outcomes of the conference

1) Multidisciplinary operational cooperation

The consensus at the conference was that multidisciplinary cooperation is essential to fight trafficking in human beings (THB). The fight against THB is not just a responsibility of Law Enforcement Agencies, but of all organizations that may come into contact with potential victims of THB. They all have a role to play when it comes to identifying possible victims of THB, preventing and/or fighting THB. It was suggested that organizations should not take a too narrow view of their own tasks and should also try to look at cases of possible THB through the eyes of their cooperating partners. For example, border guards should do more than just check passports; they should look for signs of trafficking whilst doing so. Similarly, even though fighting THB is not part of their job, housing inspectors should realize that when they identify a case of overcrowding, they need to report this as a possible sign of THB. If this should pose problems, maybe mandates need to be broadened. However, organizations should not underestimate what they can do against THB with the powers and responsibilities they already have. It might be more than they think.

When a case of THB has been identified, multidisciplinary cooperation means that there are more eyes available to identify potential victims of THB at an early stage and, subsequently, that there are more options available than just the criminal law approach. In each case, partners can discuss what would be the most effective intervention, what measures would be most likely to succeed. In some cases the answer will be that fiscal or administrative measures (for example by local governments, labour inspectors or licensing authorities) are the preferred option. In this way, multidisciplinary cooperation can contribute to more focus of the police and other investigative services on the most serious cases, in which criminal investigation is the preferred option. A combination of different measures is also possible; in that case organizations should discuss the best order in which to apply them. The barrier model used in the Netherlands can help to decide which organization is in the best position to act in a specific case.

According to the Eurostat figures published in April 2013², 61% of identified and presumed victims in the years 2008, 2009 and 2010 are from EU Member States. It was remarked several times that it is necessary to reflect on ways to offer them better protection, without impeding the free movement of people within the Schengen zone. For the necessary protection of EU victims, making better use of existing methods but also developing new (multidisciplinary) methods to counter intra-EU trafficking is a must. An observation team might for example be deployed at the airport to monitor incoming flights from risk countries, using profiles of potential victims and vulnerable groups. Any potential victims identified by this team could then subsequently be interviewed.

a and b) The role of prosecutors and (police) detectives

The police and the prosecution services have been involved in fighting THB for a long time and their approach to THB may be the most developed of the professions represented at the conference. Still, some recommendations were made to further improve their work. It was suggested that since THB is such a complex form of crime, traditional investigative techniques are not enough to fight THB, but innovative methods are needed. Examples of such innovative methods are: shutting down websites associated with THB (e.g. of an escort service using victims), sending a “text message bomb” to clients of such a service to raise awareness and gather information or putting actresses pretending to be forced to work as prostitutes in hotel rooms to see if the hotels would act on the signals. When conducting investigations, detectives and prosecutors could think about possible measures that might prevent this kind of THB from happening again and address those recommendations to the organization responsible. Investigators and prosecutors should not only target the traffickers themselves, but also the businesses and individuals facilitating THB (such as administrative offices, notaries, lawyers, taxi drivers or doctors). If prosecution for THB is not possible, prosecutors could focus on prosecuting the related crimes.

² Eurostat: Trafficking in human beings (2013)

b.1) The role of financial investigators

Financial investigations should be carried out as part of every THB investigation. Financial investigators should cooperate with tax authorities and Financial Intelligence Units where possible. Cooperation with other financial institutions such as banks or the social benefit administration should also be improved. MS might consider drawing up an inventory of possible financial measures (such as asset recovery) that could be aimed at traffickers in order to stimulate their use.

b.2) The role of internet investigators

As the internet plays a key role in recruitment for both sexual and labour exploitation, investigations on the internet are of increasing importance. Sufficient detectives should be trained to carry out such investigations. The internet, including social media, should also be monitored by digital investigators as it is the new market place where demand for and supply of sexual services are brought together. Tackling this issue requires investigators to cooperate closely with web masters and internet providers. In order to facilitate international cooperation on THB committed using the internet, all MS should ratify and implement the Convention on Cybercrime of the Council of Europe (or Budapest Convention; 2001).

c) The role of border guards

As “entry” is the second barrier (after recruitment) that traffickers encounter when they want to exploit foreign victims, border guards, immigration officials and consular staff can play an important role in preventing trafficking or stopping it at an early stage. Trafficking in human beings and people smuggling often go hand in hand when it comes to third-country nationals. The same routes and people are often used both to smuggle people and to traffic victims. Being smuggled also puts people in a position where they are vulnerable to trafficking. These types of crime should therefore be considered in relation to each other. Approaching smuggled people as possible victims of THB could for example lead to important information. Information about trends such as the use of counterfeit documents to smuggle victims into the country should be shared with all relevant partners, to enable border guards to stop trafficking in the early stages. It could be useful for border guards to receive information about who has been granted a visa, for what purpose and in what numbers.

d) The role of immigration officials and consular staff

In order to prevent the abuse of legal procedures to gain entry, embassies, consulates, immigration services and other services responsible need to be proactive in tackling THB. For this reason, consular staff and immigration officials need to be trained to recognize signs of trafficking. They also need to cooperate and exchange information with law enforcement agencies. International cooperation between migration services should be reinforced. During the conference, it was mentioned several times that there needs to be more cooperation between EU embassies and consulates in important source countries and/or regions. This can facilitate the exchange of information on trends and modus operandi and can prevent one embassy becoming a “weak link” that traffickers can exploit to obtain visa for their victims. Sometimes member states are faced with problems because of Schengen visa issued by other MS. The issue of people overstaying their visa should also be addressed somehow. An example of a source country where cooperation regarding visa applications is necessary is Nigeria. Member states that have embassies in countries where smaller member states are not represented need to assist those MS to obtain information relevant for issuing visa.

e) The role of labour inspectors and investigators

Labour inspectors and investigators play a key role in fighting THB for labour exploitation. Even though awareness about THB for labour exploitation is increasing, more attention could still be paid to this phenomenon. The approach to fight labour exploitation needs to be further developed and brought to a higher level by member states and Europol. New forms of labour exploitation (i.e. exploitation in new sectors) are still emerging, so labour inspectors and investigators (and other professionals) should keep their eyes open for previously unknown manifestations of this crime. Involvement in fraud through deceit or coercion (for example social benefit fraud) is one of these new and largely still hidden forms of THB. Special attention also needs to be paid to labour exploitation in the so-called “hidden economy”. Labour inspectors need to cooperate closely with the (aliens) police and border guards to detect labour exploitation.

Front-line officers such as labour inspectors need to have the tools and training to be able to identify signs of labour exploitation and to differentiate bad working conditions from THB. Cases of labour exploitation need to be analyzed, so that trends can be identified and inspections can be better targeted at specific types of THB. The powers of labour inspectorates within the EU differ from country to country, so an overview of these powers would facilitate cross-border cooperation. Maybe a platform could be established (for example as part of EMPACT THB) for law enforcement and labour inspectorates to discuss THB for labour exploitation in order to enhance cooperation and the exchange of expertise.

f) The role of local governments

Local governments can play an important role in the fight against THB. The role of local governments in the fight against THB has great potential and complements the role of law enforcement authorities. Local governments should for example not underestimate the amount of information they have that might be of use in THB investigations. Local government and other administrative officials can also play an important role in identifying potential victims of THB, since they often come into contact with the public. Local frontline officials should therefore be trained to be able to identify THB. For example, housing or health and safety inspectors have to be aware of signs of THB. A card with indicators of THB could be developed for local governments by the informal network on the administrative approach, based on the work that has been done within the EU funded project on First level identification/ detection of victims led by France.

Administrative measures are often easier to implement and will take less time than a prosecution. This is because a conviction (or warrant) is not necessary to take administrative action. One type of administrative measure that can be of great use is the power to close down premises or businesses, for example by refusing or withdrawing a permit. The parties involved in the fight against THB should be aware which administrative authorities have this power. Those authorities should then be provided with information on possible cases of THB taking place within their territory, so that they can consider closing the premises or the business. By using this power, administrative authorities can play an important role in stopping criminals from infiltrating the legal economy or using businesses as a cover for trafficking. Another instrument that administrative authorities can use are zoning plans, to prohibit or concentrate certain kinds of business in specific areas.

For example, when there is a proliferation of businesses where employees are vulnerable to exploitation, such as souvenir shops or late-night shops, a zoning plan can be used to limit the areas where they are allowed and/or the number of shops. This keeps the necessary inspections of these shops manageable. Administrative authorities should also try and prevent local infrastructure (such as licensing systems) being misused by criminals.

In order to enhance the distribution of information and expertise on the administrative approach to THB, wider access should be provided to the EU platform for experts at Europol (EPE) on the administrative approach (e.g. to local authorities).

g) Other possible partners

When it comes to involving other organizations in the fight against THB, it was suggested that “unusual” partners should also be thought of. For example, postal services, landlords and energy companies may all pick up signals of overcrowding in a house, which could be a sign of trafficking. Health care professionals may come into contact with victims that have been hurt as a result of trafficking, or may be faced with requests for breast enlargements or abortions from a pushy male accompanying a reluctant woman. By training health care professionals to identify signs of THB, they also become partners in the first level identification of potential victims. Other usual and unusual organizations that were mentioned as possible partners are community police officers, tax authorities, housing and health and safety inspectors, private actors such as financial institutions, internet providers, airlines (cabin crew), Chambers of Commerce and hotels, and civil society and NGOs.

h) The role of EU and international partners

As in most countries the great majority of THB victims are foreign nationals, European and international cooperation against THB is essential. The Rantsev case makes clear that international cooperation against THB is not an option, but a duty. Building relations and networks are preconditions to successful European cooperation. Cooperation becomes easier when partners understand what another country needs in order to start up an investigation. The use of uniform indicators to identify victims will also facilitate any joint efforts. The EMPACT project on THB forms an important part of EU operational cooperation against THB. In order to make the EMPACT project truly operational, member states should identify relevant cases that could be tackled as part of EMPACT.

In order to make EMPACT more multidisciplinary, the national EMPACT coordinators need to raise awareness of EMPACT among the different organizations that are needed for a multidisciplinary approach.

More use should be made of EU instruments for operational cooperation such as JITs and Europol and Eurojust. The EU agencies are a necessary link in the multidisciplinary chain and member states should share more information with them. It would be interesting to see if other organizations (e.g. tax authorities, local authorities) could be included or involved when using these instruments.

One example of a form of trafficking where European and international cooperation is imperative is Nigerian trafficking. This is because of its specific nature; once one country tackles the problem, it simply moves to another country. Nigerian girls are moved around quickly (in a so-called “carousel”), and traffickers often develop new routes and new MOs, so there is a need to work fast. Cooperation with and training for Nigerian organizations is therefore important. More knowledge of Nigerian trafficking is needed at all levels; this can e.g. be achieved through exchange of experts and study visits.

In general, it pays to build up cooperation with source countries of trafficking before there are actual cases (for example by exchanging information on signals of THB); this will speed up cooperation when the cases are there. Officials from source countries need to be trained to identify possible victims and fight THB, as they are in a position to stop THB at an even earlier stage than consular staff and border guards. Source countries also need to set up prevention projects.

2) Raising multidisciplinary awareness and providing multidisciplinary training

Multidisciplinary cooperation against THB starts with raising awareness among the organizations and professionals that have a role to play in preventing and fighting THB. Awareness raising activities can be aimed at the whole range of "usual" and "unusual" partners mentioned before: private actors such as financial institutions, landlords, energy companies, internet providers, the cultural sector and sports clubs; (semi-) public actors such as postal services, health care professionals, schools, tax authorities and consular staff (in addition to the organizations the conference was aimed at: public prosecution services, police, border agencies, immigration services, labour inspectorates or criminal investigation services in this field and local governments) and organizations such as NGOs and shelters.

In addition to raising awareness amongst professionals, it is very important to raise awareness amongst vulnerable groups themselves. For example, activities to raise awareness (including of cultural aspects) could be aimed at Roma communities, both in countries of destination and origin. Raising awareness has to be a continuous process; a single campaign is not enough. One idea mentioned was to hold simultaneous awareness campaigns in countries of origin, transit and destination.

Training should also be provided to a wide range of actors, although maybe not quite as wide as for awareness. Stakeholders need to be trained on how they can identify possible victims of THB and how (to whom) they can report possible cases of THB. MS should exchange material and best practices regarding training. Uniform training for first-level identifiers in the EU would be an advantage, as it would mean that member states would be working in similar ways. A comprehensive package for identification has been developed within the EU-funded project on First level identification/detection of victims (led by France) that is suitable for and will soon be available to all stakeholders³. Key authorities in the area of THB (courts, prosecution services, police, labour inspectorates and so on) should put in place specialized staff to deal with trafficking cases on a daily basis.

3) Multidisciplinary exchange of information

There was general agreement that it is important to improve multidisciplinary exchange of information both nationally and between countries. Multidisciplinary exchange of information can help fill gaps in information that currently exist and build a more complete picture of the issue. Where there are legal barriers that prohibit multidisciplinary exchange of information, MS might consider removing these barriers. (In relation to this, research into the legal possibilities and gaps for exchanging information between member states to be used for administrative measures is currently being carried out within the project 'Info exchange administrative approach'). Some suggested that working in one national database on THB could improve the exchange and analysis of information. Of course, the feasibility and desirability of such an option depends on the current national infrastructure. The method or system chosen to collect information in a multidisciplinary way needs to fit into the national systems in place.

³ The report of good practices collected by this project is already available at <http://www.fei.gouv.fr/en/our-projects/focus-on-/euro-trafegu.html>.

Regardless of the systems in place, personal contacts and trust are also still very important when it comes to sharing information. Informal networks and liaison officers are good ways to establish such personal contacts and to build trust. Giving feedback about the value that was added by the information provided will stimulate active involvement in the future.

In order to identify victims and stop trafficking as early as possible, information needs to be collected and shared in a pro-active manner. When gathering information, organizations should go beyond their ordinary tasks and also collect information that might be of use to partner organizations. This will also enable the creation of a common intervention strategy. Within the EU, information about signs of trafficking needs to be shared in a dynamic way, constantly updating the latest intelligence. Local, regional and national signals needs to be combined with international signals, in order to complete the intelligence picture and identify links between trafficking cases. Sharing information with Europol also eliminates the risk of two countries working on the same case without being aware of each other's investigations.

4) Multidisciplinary or cross-border cooperation regarding victims

During the discussions, several issues came up with regard to victims that require multidisciplinary or cross-border cooperation. It is often difficult for authorities to gain the trust of victims. One suggestion to solve this problem is to cooperate with cultural mediators. They can “translate” between the cultures of the authorities and the victims and thus help to avoid misunderstandings and improve communication. It is important to take language and cultural aspects into consideration when talking to victims. Cultural mediators may also be able to help victims realize that they are in fact victims, since they are familiar with both the situation the victim came from in the source country and the situation they ended up in in the destination country. Authorities could of course also invest in improving their own language skills and cultural knowledge.

The need for the establishment of a European Referral Mechanism for victims (as provided for in the EU anti-trafficking strategy⁴) was highlighted, to make sure that victims receive the necessary support when they return home. This can be an important instrument in preventing revictimization. It might also be helpful to deal with cases in which victims file a formal complaint in one country about THB that took place in another country (and should therefore be investigated in the latter). Another issue that was raised is that of protection of the victim. How can protection be ensured during criminal proceedings or when victims return to their own country? If the victims themselves do not return home, it may still be the case that their family back home needs protection. Close cross-border cooperation is very important in these cases. Any protection measures can only be taken with the victim's consent, of course.

When victims do return home, efforts have to be made so that they can still enjoy their full rights regarding criminal proceedings and compensation. It should be possible to hear the testimony of EU victims who have returned home in court, for example by using video technology. A good framework for compensation to victims should include the possibility for them to claim compensation even though they have left the country where the THB took place. Member states should play an active role in ensuring these rights. They might consider paying the compensation awarded to a victim in cases where the trafficker is not forthcoming and then using their (stronger) position to recover the money from the trafficker. Compensation of the money the victims should have earned is in the interest of the authorities too, as it may be an incentive for victims to testify and takes away the profits the traffickers set out to make in the first place.

⁴ EU strategy towards the eradication of trafficking in human beings 2012–2016, COM(2012) 286 final; PRIORITY A: Identifying, protecting and assisting victims of trafficking, Action 1: Establishment of National and Transnational Referral Mechanisms.

5) Structures and projects to support multidisciplinary cooperation

It was suggested many times that some sort of structure is necessary to facilitate multidisciplinary cooperation against THB. Platforms or (informal) networks consisting of the organizations involved could be set up at both the local and national level. They could improve trust, shorten lines of communication, increase coordination and cooperation and enhance the sharing of expertise and best practices. Some suggested formalizing such structures, for example through legislation or Memoranda of Understanding. Whether this is necessary depends on things such as the level of formality with which member states normally organize such forms of cooperation and how much encouragement the intended partners still need to fully commit to the issue. Regardless of the level of formality chosen however, in the end successful cooperation depends on close personal contacts. Developing close contacts with relevant national and foreign partners is therefore key for every organization involved.

Standard operating procedures or protocols can also help to structure cooperation. Even though organizations need to go beyond their own mandate when looking for signs of trafficking, it is still useful to clearly define and allocate responsibilities within such structures or protocols. Coordination is also necessary to streamline cooperation and avoid duplication of efforts.

In order to gain experience with multidisciplinary cooperation and create best practices to share with other MS, more multidisciplinary projects could be set up, where possible with EU subsidy. These projects could lead to more structural forms of multidisciplinary cooperation. The existing platforms, networks and projects may also benefit from becoming more multidisciplinary. A good example of this is the EMPACT project on THB, where efforts are underway to involve other partners besides police forces and prosecution services. Within EMPACT, knowledge could be built up about the role and responsibilities of all agencies involved in the fight against THB and about the legal frameworks in the MS, in order to facilitate cooperation. More partners will allow EMPACT to become more effective, since it will lead to a clearer picture of the cases to be tackled and a wider range of possible interventions to choose from. This will hopefully make it possible to dismantle whole networks instead of a single organized crime group.

Conclusions and recommendations

Multidisciplinary operational cooperation and exchange of information

- Multidisciplinary cooperation is essential to fight trafficking in human beings (THB).
- The fight against THB is not just a responsibility of Law Enforcement Agencies, but of all organizations that may come into contact with victims of THB.
- Organizations should not take a narrow view of their own tasks and try to also look at cases of possible THB through the eyes of their cooperating partners.
- Multidisciplinary cooperation means that there are more eyes available to identify potential victims of THB at an early stage and, subsequently, that there are more options available to tackle a case than just the criminal law approach. In each case, partners can discuss what would be the most effective intervention. This way, multidisciplinary cooperation can free up the police and other investigative services to focus on the most important cases.
- A kind of barrier model, like the one used in the Netherlands, can help to decide which organization is in the best position to act in a specific case.
- It is important to improve multidisciplinary exchange of information both nationally and between countries, to fill the gaps in information that currently exist.
- In order to gain experience with multidisciplinary cooperation and create best practices, more multidisciplinary projects could be set up, where possible with EU subsidy.
- Since 61% of identified and presumed victims are EU nationals, it is necessary to reflect on ways to offer them better protection by developing new methods, without impeding the free movement of people within the Schengen zone.

The role of prosecutors and (police) detectives

- Financial investigations should be carried out as part of every THB investigation.
- MS might consider drawing up an inventory of possible financial measures (such as asset recovery) that could be aimed at traffickers in order to stimulate their use.
- Investigators and prosecutors should not only target the traffickers themselves, but also businesses and individuals facilitating THB.

The role of internet investigators

- As the internet plays a key role in recruitment for both sexual and labour exploitation and as the new market place where demand for and supply of sexual services are brought together, investigations on the internet are of increasing importance. Sufficient detectives should be trained to carry out such investigations. A successful approach also requires investigators to cooperate closely with web masters and internet providers.
- In order to facilitate international cooperation on THB committed using the internet, all MS should ratify and implement the Convention on Cybercrime of the Council of Europe (or Budapest Convention; 2001).

The role of border guards

- Trafficking in human beings and people smuggling often go hand in hand when it comes to third-country nationals. These types of crime should therefore be considered in relation to each other.

The role of immigration officials and consular staff

- In order to prevent the abuse of legal procedures to gain entry, embassies, consulates, immigration services and other services responsible need to be proactive in tackling THB and to cooperate and exchange information with law enforcement agencies..
- There needs to be more cooperation between EU embassies and consulates in important source countries and/or regions. This can facilitate the exchange of information on trends and modus operandi and can prevent one embassy becoming a “weak link” that traffickers can exploit to obtain visa for their victims.

The role of labour inspectors and investigators

- The approach to fight labour exploitation needs to be further developed and brought to a higher level by member states and Europol. New forms of labour exploitation (i.e. exploitation in new sectors) are still emerging, so labour inspectors and investigators should keep their eyes open for previously unknown manifestations of this crime.
- Front-line officers such as labour inspectors need to have the tools and training to be able to identify signs of labour exploitation and to differentiate bad working conditions from THB.

- Maybe a platform could be established (for example as part of EMPACT THB) for law enforcement and labour inspectorates to discuss THB for labour exploitation in order to enhance cooperation and the exchange of expertise.

The role of local governments

- Local government officials can play an important role in the fight against THB, for example in identifying potential victims of THB, since they often come into contact with the public. Local frontline officials should therefore be trained to be able to identify THB.
- A card with indicators of THB could be developed for local governments by the informal network on the administrative approach, based on the work that has been done within the EU funded project on First level identification/ detection of victims led by France.
- Administrative measures are often easier to implement and will take less time than a prosecution. One type of administrative measure that can be of great use is the power to close down premises or businesses.

Other possible partners

- “Unusual” partners should be thought of when it comes to involving other organizations in the fight against THB. For example, postal services, landlords and energy companies may all pick up signals of overcrowding in a house, which could be a sign of trafficking.

EU cooperation

- In order to make EMPACT more multidisciplinary, the national EMPACT coordinators need to raise awareness of EMPACT among the different organizations that are needed for a multidisciplinary approach.
- Uniform training for first-level identifiers in the EU would be an advantage, as it would mean that member states would be working with uniform indicators. A comprehensive training package has been developed within the EU-funded project on First level identification/detection of victims (led by France) that is suitable for and will soon be available to all stakeholders.

Multidisciplinary or cross-border cooperation regarding victims

- Authorities could use cultural mediators to “translate” between the culture of the authorities and that of the victims and thus to help build trust.
 - The need for the establishment of a European Referral Mechanism for victims (as provided for in the EU anti-trafficking strategy) was highlighted.
-