

# NGO Atina's commentary on the 2025 Statistical report on identified victims of human trafficking in Serbia

## Rising reports without proportionate strengthening of identification and protection

The 2025 statistical report of the Centre for the Protection of Victims of Human Trafficking (hereinafter: the Centre) records an increase in reports of suspected human trafficking, as well as an increase in the number of formally identified victims. However, the data points to a key systemic challenge: despite the higher volume of reporting, recognition and formal identification remain uneven and selective, particularly in cases involving foreign nationals subjected to labour exploitation.

## Reports and outcomes: more reports do not automatically mean more protection

In 2025, the Centre received 240 reports of suspected human trafficking (30% more than the previous year), bringing the total to nearly twice the 2021 level. The outcomes reveal a clear gap between the volume of reporting and the level of formal identification. Based on reports submitted in 2025, 59 victims were identified, with an additional 15 identifications linked to reports from the previous year. At the same time, 59 reports were dismissed; in 72 cases, it was concluded that human trafficking had not occurred; and 41 procedures remain ongoing. This distribution shows that an increase in reporting does not translate into a proportionate strengthening of the system's capacity to identify trafficking promptly and ensure access to rights and protection for people at risk and identified victims.

## Who reports - civil society as a "detector," institutions without a proportionate contribution

The fact that the highest number of reports (90) came from civil society organisations indicates that civil society continues to serve as a key "detector" in practice. At the same time, institutional reporting is underrepresented relative to what would be expected in a system that bears primary responsibility for protection. It is particularly indicative that civil society achieves this contribution with minimal resources: in practice, only around ten professionals across Serbia work continuously on this issue, whereas the state system has capacities measured in the tens of thousands of employees.

At the same time, despite the significant growth in reports related to labour exploitation and the increase in identified victims, the Labour Inspectorate submitted only one report, and that report was dismissed. In the context of a sharp rise in labour migration and reports of labour exploitation, alongside an almost doubled number of processed D-visa applications (approximately 105,000 in 2025 compared to around 58,000 in 2024), this finding goes beyond a "statistical detail." It points to a serious functional gap in the system: the Labour Inspectorate, which should be a key point for early detection and referral of labour exploitation cases, remains minimally engaged in reporting and in actively contributing to the identification process.



## Education: training exists, but operational results are missing

In recent years, the education system has been the focus of numerous training initiatives, and specific indicators for recognising human trafficking within educational institutions have been developed. Nevertheless, only one report was submitted from this sector in 2025. This finding gains additional weight considering the profile of identified victims: of the total 71 formally identified victims, 35 were minors (approximately 49%).

This discrepancy, between the share of minors among identified victims and the minimal contribution of the education sector in referring cases, raises questions about the effects and practical applicability of the trainings delivered. Specifically, it is necessary to reassess whether the trainings were sufficiently practical and oriented toward real-life response, whether they reached staff who are in direct contact with children and young people, whether clear and functional reporting protocols and channels exist, and whether institutions have been provided with the capacity and support to act consistently on suspicion. Overall, the data suggest that the increase in reports has not been matched by an equally significant improvement in the system's operational response, from early recognition in key sectors, through consistent referral, to timely formal identification and the provision of protection.

## Forms of exploitation: labour exploitation dominates reports, but “slides” into other classifications

A deeper look at reports by type of exploitation shows that the highest number of reports concern labour exploitation (114), followed by sexual exploitation (53). At the same time, the structure of formally identified victims shows an equal share of labour and sexual exploitation: 26 victims in each category, i.e., 35% of all identified victims.

A particularly significant finding is that in as many as 62% of cases where there was suspicion of labour exploitation, the assessment outcome was redirected toward qualifying the case as a labour-rights violation or “fraud,” rather than recognising elements of human trafficking. From Atina's perspective, this indicates a systemic tendency whereby, instead of identifying trafficking and coercion, cases are “lowered” to the level of labour-rights violations, thereby losing sight of key indicators: continuity of coercion, control, violence, restriction of free choice, and specific vulnerabilities, especially when foreign nationals are involved. Therefore, this pattern cannot be interpreted solely as a methodological issue in identification. Above all, it points to insufficient institutional readiness to recognise and treat labour exploitation consistently as a form of human trafficking, rather than primarily as a labour-rights violation.

## Foreign nationals and labour exploitation: mass suspicion, limited identification

The report explicitly states that 64% of reports concern foreign nationals, a significant increase from 36% in 2024 and 20% in 2021. At the same time, the Centre notes that “the majority of victims are still Serbian nationals,” which further underscores the need to precisely examine the relationship between the volume of suspicion in transnational cases and the outcomes of formal identification.

Within transnational cases, where individuals most often come from countries in Asia and Africa (e.g., Bangladesh, China, Zimbabwe, Kyrgyzstan, the Philippines, Nepal, Egypt, India), 154 reports of suspected exploitation were recorded, and 76% of these reports related to labour exploitation. However, the relationship between the

number of reports (154) and the number of formally identified victims (27) points to limited system “throughput” when migrants and foreign nationals are exposed to regimes of high dependency, where employment is intertwined with accommodation, debt, and migration status (employer–accommodation–debt–status).

Of the total 27 formally identified victims who were foreign nationals, 20 were identified as victims of labour exploitation, more than a twofold increase compared to the previous year. It is also essential to highlight the territorial dimension: 4 foreign victims were exploited outside Serbia, while 23 were exploited in Serbia. In addition, in 2025, the pattern of identifying smaller groups of foreign nationals in the context of labour exploitation continued (e.g., 8 from Zimbabwe and 5 from India), pointing to recurring recruitment and exploitation patterns that require targeted, proactive measures by the competent authorities.

## **Institutional “throughput” by source of report: imbalance and misalignment of assessments**

For the second consecutive year, civil society organisations recorded the highest number of reports (90) among all actors. In contrast, the Ministry of Interior, according to the Centre’s records, registered 68 reports of suspected human trafficking. Analysis of outcomes by reporting source indicates a pronounced institutional imbalance: reports from the Ministry of Interior result in formal identification in 33% of cases, while reports from civil society lead to identification in 17%. At the same time, among civil society reports, outcomes such as “dismissed/terminated/no victim identified” dominate (68%).

This distribution raises two critical issues. First, it indicates uneven system throughput across reporting sources, which can have direct consequences for access to protection. Second, it suggests that the preliminary recognition process is not sufficiently aligned with the Centre’s subsequent assessment. Despite available capacity and experience, both institutions and civil society often report situations that the Centre later does not confirm, or, conversely, miss situations that should have been recognised earlier.

At least two interpretations are possible: either (1) actors in the system still lack sufficiently specific knowledge and tools to recognise contemporary trafficking patterns, particularly in complex labour exploitation cases; and/or (2) the Centre’s existing criteria and assessment practice remain restrictive and insufficiently adapted to the current context of exploitation, especially regarding foreign nationals and labour exploitation. In any case, the finding points to a model in which civil society is effectively used as a “radar” to detect suspicious situations, but without sufficiently formalised mechanisms to acknowledge, verify, and systematically integrate the information that organisations gather through direct work with potential victims.

## **Gender dimension and children: long-term recovery requires stable resources**

The report confirms that human trafficking in 2025 remains predominantly a gender-based form of violence, with significant and long-term consequences that require continuous support and additional resources that the system currently lacks to a sufficient degree. Of the total 74 formally identified victims, 69% were women. The Centre particularly notes that among children, cases often involve sexually exploited girls who require continuous intensive support, while recovery is long and uncertain. These findings indicate that the system cannot be considered truly protective without stable, predictable funding for specialised, trauma-informed services, beyond the logic of short-term projects and ad hoc support.



## Recommendations: from documentation to proactive protection

Out of 240 reports, the Centre initiated 5 procedures ex officio. This is a critical practice that should be strengthened, but the scale indicates that proactive action remains neither standardised nor routine; it is rather an ad hoc measure.

Based on our reading and analysis of the report, we consider it urgent to introduce a mandatory follow-up verification and monitoring mechanism, as well as the possibility to review decisions in all cases where a report is dismissed due to "insufficient data" or a person is not identified as a victim. At the same time, indicators of serious rights violations exist (particularly in the context of employment). Such a mechanism must include a renewed risk assessment, documentation of key indicators, and clear information for the person about their rights and safe channels for re-engaging with support services and specialised service providers.

In addition, it is necessary to stop the practice of "formal dismissal" of reports without active efforts to locate the person and without proactive attempts to establish contact in cases of (potential) trafficking. If 76% of dismissals are due to an inability to identify the person, this clearly indicates that the priority should be strengthening proactive methods and outreach, rather than administrative closure of cases.

At the same time, procedures must be accelerated and interim protective measures introduced for all cases recorded as "ongoing" (41), as the risk to a potential victim typically increases over time, especially when the person lacks clear information, support, and access to safe channels of assistance.

It is also necessary to systematically strengthen the capacities of the Labour Inspectorate so that it can assume, in practice, the role it must have under its mandate: a first-line mechanism for identifying and referring cases of labour exploitation and potential trafficking. This requires clearly defined operating and referral protocols, continuous specialised training based on real-life scenarios, accessible operational tools, and precise coordination with the Centre and other competent institutions. The Inspectorate's current contribution, one report and zero identifications from that report, clearly indicates severe systemic constraints that must be removed. It is therefore essential to urgently identify what is preventing the Inspectorate from acting proactively and consistently: whether this is due to an unclear regulatory framework, insufficient staff, imprecise instructions, practical limitations on its powers, or a lack of coordination. Without mapping these barriers and investing in operational capacity, the Labour Inspectorate cannot function as an effective protective mechanism for domestic and foreign workers exposed to exploitation, and the system remains without a key pillar of prevention and early detection.

At the same time, we recommend introducing a standardised category of "person at risk" as a protective measure. In practice, a significant number of individuals are not formally identified as victims, even though their living and working patterns indicate exposure to situations that may lead to exploitation. This is further supported by the report's findings, particularly those recorded under outcomes classified as "labour-rights violations and fraud."

## Conclusion

The report confirms that the system is collecting more information, but still does not adequately address the key question: what happens to people when the system does not "recognise" them? Closing a case on the grounds of "insufficient data," without follow-up verification and monitoring mechanisms and without the possibility of review, leaves a person without protection in a situation of sustained or increased risk. In the context of human trafficking, an administrative qualification is not the

end of the process; the end comes only when risks are removed, and real, accessible, and continuous protection is ensured.

From NGO Atina's perspective, this finding carries additional weight, given that Atina has provided direct support to victims and people at risk for 23 years and has witnessed firsthand the consequences of delayed recognition and inadequate protection. Therefore, it is necessary to improve the system to avoid being limited to recording suspicions and assigning statuses. Still, it develops proactive protection mechanisms, including follow-up verification and monitoring, review of decisions, interim protective measures, and continuous support, to ensure the rights and safety of all people at risk.

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**Author:** Zorana Parezanović,  
Programme Coordinator, NGO Atina

