SAFE HAVEN
Expanding Shelter Resources for Trafficking Survivors in the Western Balkans

World Vision
BOSNIA AND HERZEGOVINA

# Sheltering Services for Victims of Trafficking

# A Mapping Report for Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, and Serbia

Author: Ivana Radović

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# List of Abbreviations

BiH – Bosnia and Herzegovina

CoE – Council of Europe

GRETA – Council of Europe Group of Experts on Action against Trafficking in Human Beings

KIIs – Key informant interviews

NRM – National Referral Mechanism

NCATS - National Coalition of Anti-Trafficking Shelters

NGO – Non-governmental organization

SFA – BiH Service for Foreigners' Affairs

SIPA – BiH State Investigation and Protection Agency

SOP – Standard Operating Procedures

THB – Trafficking in human beings

TIP – Trafficking in persons

TVPA - Trafficking Victims Protection Act

U.S. – United States

VoT – Victim of trafficking

# Summary

Trafficking in human beings remains one of the most persistent and complex human rights challenges in the Western Balkans. Despite robust legal frameworks and national referral mechanisms in all five countries observed (Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, and Serbia), the provision of specialized, sustainable, and comprehensive support for victims of trafficking continues to face systemic constraints. This mapping report, prepared within the framework of the *Safe Haven: Expanding Shelter Resources for Trafficking Survivors in the Western Balkans* project, assesses the availability and quality of sheltering and associated services, funding modalities, and reintegration opportunities across the region.

**Methodology and Scope**

The research combined desk review, key informant interviews (28 service providers and government representatives), and interviews with eleven survivors who had lived in shelters. All country reports were fact-checked by local partners. The focus was on sheltering services for victims of trafficking between 2022 and 2024, with particular attention to funding structures, licensing, standards, staffing, and the availability of reintegration services. Survivor inputs were gathered ethically, with strict safeguards and trauma-informed protocols.

**Regional Context**

The Western Balkans remain both origin, transit, and destination for victims of trafficking. Sexual exploitation, forced begging, and forced marriages dominate the picture, with Roma children disproportionately affected, while labor exploitation is on the rise. Victims are predominantly domestic citizens trafficked internally, though the number of foreign nationals identified is increasing. Children represent a significant proportion of victims in every country, yet specialized support for children is limited and inconsistent. Men and boys remain marginalized in both identification practices and access to assistance.

**Shelters and Victim Support**

Sheltering is a cornerstone of protection for victims of trafficking in the Western Balkans. International instruments, notably the Palermo Protocol and the Council of Europe Convention on Action against Trafficking in Human Beings, require states to provide safe accommodation and assistance adapted to victims' recovery needs. In practice, however, provision across Albania, Bosnia and Herzegovina (BiH), Montenegro, North Macedonia, and Serbia is limited in scope, fragmented, and heavily reliant on NGOs.

All five countries have at least some forms of specialized accommodation, yet capacity is low and gaps for children, men, foreign victims, and individuals with complex needs are acute. Shelters are formally available nationwide and admission is consent-based, but only for certain categories of victims, mostly women and teenage girls. The majority of specialized shelters are operated by established NGOs, some of which also run services for domestic violence survivors and engage in prevention, advocacy, and policy work. State-run facilities exist in Albania, Montenegro, and Serbia, while in North Macedonia a single specialized shelter is NGO-operated under government authority. Only two shelters in the entire region

admit adult men: Albania's state shelter and *Žene sa Une* in BiH. Although many shelters admit children, very few are designed specifically to meet their needs, and generally specialized facilities remain rare.

**Key Findings**

Funding and sustainability

- State financing exists in all five countries, but allocations are partial, unpredictable, and often retroactive. In Serbia, a licensed NGO sheltering service does not receive any state funds.
- NGO-run shelters rely heavily on donor projects to sustain services, including staff salaries, psychotherapy, vocational training, and reintegration.
- No country has established permanent budget lines or multi-annual agreements that guarantee stability. Licensing, where in place, rarely translates into funding security.

Licensing and standards

- Licensing and quality frameworks vary widely. Albania has a comprehensive and permanent licensing regime, while BiH relies on annual cooperation protocols. Montenegro and Serbia operate detailed but bureaucratic and burdensome systems; North Macedonia's licensing ensures basic conditions but no automatically guaranteed funding.
- Minimum standards for sheltering are generally structural, with limited mechanisms for genuine quality assurance. Comprehensive standards for broader victim support (beyond accommodation) are largely absent.

Staffing and professional capacity

- Shelters are staffed by multidisciplinary teams, including social workers, psychologists, and legal advisors. However, staffing levels are insufficient, workloads are heavy, and turnover is high due to low and unstable salaries.
- Most shelters seek to provide supervision for staff working with VoTs, but access depends on project-based funding. Staff wellbeing is not systematically integrated into national systems.

Services in shelters

- Core services—safe accommodation, food, clothing, psychological support, legal aid, and education—are provided in all countries.
- Access to specialized services, such as psychiatric care, addiction treatment, or support for victims with disabilities, remains extremely limited.
- Shelters for men are largely absent, and services for children often fail to meet specialized needs. Long-term housing, economic empowerment, and employment opportunities are among the weakest areas.

Reintegration

- Reintegration is consistently the weakest link in victim support across the region. While NGOs offer transitional housing, vocational training, and follow-up, these are project-based, underfunded, and geographically limited.
- State institutions formally responsible for reintegration lack resources, expertise, and sustainable programs. As a result, many victims leave shelters without long-term stability, facing poverty, marginalization, and the risk of re-trafficking.

**Survivors' Perspectives**

Survivors who contributed to this report consistently described shelters as places of safety and recovery where staff provided not only protection but dignity and respect. They valued psychological support, education opportunities, and guidance in rebuilding their lives. At the same time, they called for more freedom of movement, transitional housing options, stronger reintegration programs, and greater involvement of survivors themselves in shaping policies and services.

**Regional Trends and Gaps**

Across all five countries, shelters are essential but under-resourced. Common patterns include:

- strong reliance on NGOs for professionalism and continuity;
- uneven and unstable funding mechanisms;
- insufficient provision for men, children, and individuals with complex needs;
- overdependence on donor support;
- limited reintegration services; and
- staff burnout due to inadequate systemic support.

Despite these challenges, the region also demonstrates strengths: dedicated and experienced NGOs, consent-based admissions, comprehensive crisis support, and national coverage of services in each country.

**Recommendations**

The report therefore calls for:

- adoption of comprehensive minimum standards for victim support, developed specifically for practitioners;
- predictable, multi-year state funding that covers full operational and reintegration costs;
- expansion of specialized services for men, boys, and children, alongside stronger mental-health and addiction support;
- development of structured reintegration pathways, including transitional housing, vocational training, and employment support;

- simplification and equal application of licensing systems, linked to transparent quality assurance;
- integration of staff wellbeing into funding and quality standards; and
- meaningful participation of survivors in the design and evaluation of services.

**Conclusion**

Sheltering systems in the Western Balkans provide indispensable protection and life-saving support for victims of trafficking. Yet, they remain structurally fragile, underfunded, and unable to fully meet the diverse needs of all victim groups. Ensuring sustainable financing, developing specialized services, and building robust reintegration pathways are urgent priorities. Achieving these goals requires genuine political will, systematic state engagement, and continued collaboration with experienced NGOs and survivors themselves. Only through such a comprehensive and sustainable approach can the region move beyond emergency responses and ensure lasting recovery, dignity, and independence for all victims of trafficking.

# Introduction

Trafficking in human beings (THB) is a grave violation of human rights and a global phenomenon that affects every region of the world. Millions of women, men, and children are exploited each year for various purposes including sexual exploitation, forced labor, domestic servitude, forced begging, and criminal activities. THB thrives on inequality, conflict, weak governance, and demand for cheap or exploitative labor, and it continues to adapt to global shifts in migration, technology, and armed crises. The Western Balkans is not immune to these dynamics. On the contrary, the region's geographic position on major migration routes, combined with still fragile institutions and ongoing socio-economic challenges, makes it particularly vulnerable to trafficking and related exploitation.

In this context, the Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime (Palermo Protocol), and more broadly the Council of Europe Convention on Action against Trafficking in Human Beings (CoE Convention) set out clear obligations for States Parties to adopt measures that guarantee the physical, psychological, and social recovery of victims. These measures must be provided in a non-discriminatory manner, regardless of the victim's sex, age, nationality, or form of exploitation. The CoE Convention specifies minimum standards of assistance, including secure accommodation, subsistence, medical care, psychological support, legal assistance, counselling, interpretation, access to education for children, and measures that ensure victims' rights during criminal proceedings. Importantly, Article 12 establishes that such support must never be made conditional on the victim's willingness to cooperate with law enforcement authorities.

The United States' (U.S.) standards, most prominently the Trafficking Victims Protection Act (TVPA) and the Annual Trafficking in Persons (TIP) Report, reinforce the global framework by highlighting the responsibility of governments to ensure victim-centered, rights-based responses. Both U.S. and European standards underline that adequate assistance is not an optional component of anti-trafficking policy but a core obligation and a precondition for meaningful recovery and reintegration.

**Context and Objectives**

*Sheltering Services for Victims of Trafficking: A Mapping Report for Albania, Bosnia and Herzegovina, Montenegro, North Macedonia and Serbia* is part of the project *Safe Haven: Expanding Shelter Resources for Trafficking Survivors in the Western Balkans*, coordinated by World Vision International in Bosnia and Herzegovina (BiH), with the support of local partners: Foundation *Lara* (BiH), Mary Ward Loreto (Albania), Association *Atina* (Serbia), and Open Gate/La Strada (North Macedonia). The project is funded by the U.S. Department of State, Office to Monitor and Combat Trafficking in Persons.

The overall objective of the mapping exercise is to establish whether existing sheltering services in five selected countries ensure durable, high-quality, and sustainable support for victims of trafficking (VoTs). The study examines the extent to which shelter services are available, integrated into victim-centered systems, and embedded in effective referral mechanisms at both local and national levels. It also explores

the viability of funding models, recognizing that sustainability cannot rely exclusively on donor contributions but must involve predictable and long-term national financing.

Specifically, the study sought to:

- Develop a comprehensive inventory of active shelter providers and services;
- Assess sheltering capacity and operational modalities;
- Map funding structures and sustainability challenges;
- Identify gaps in standards, licensing, and quality control;
- Analyze how shelters and services address the diverse needs of women, men, and children, including migrants and those exploited in different sectors.

**The Western Balkans Context**

The Western Balkans faces a combination of risks that heighten exposure to THB: the effects of protracted instability in nearby regions such as Ukraine and the Middle East; intensified irregular migration flows through the Balkans route; and entrenched socio-economic vulnerabilities. While trafficking in women and girls for sexual exploitation has historically received the most attention, there is a growing recognition of trafficking of men and boys for labor exploitation, as well as the specific vulnerabilities of unaccompanied children. These realities demand a comprehensive and flexible system of care that recognizes diverse victim profiles.

Despite the legal and institutional commitments across the region, the actual availability of assistance measures remains inconsistent and fragile. CoE Group of Experts on Action against Trafficking in Human Beings (GRETA) has repeatedly underlined that services are often unevenly distributed, with insufficient numbers of specialized shelters, limited places available, inadequate long-term options, and frequent reliance on emergency arrangements. In many countries, anti-trafficking services for men and boys are virtually absent, while the needs of women with children remain poorly addressed. Child victims, in particular, are affected by the lack of specialized facilities designed to ensure their safety, psychosocial support, education, and rehabilitation in line with the best interests of the child.

**Sheltering and Support Services**

Shelters are recognized as a cornerstone of victim assistance. When VoTs break free from exploiters, they are often left in a situation of extreme insecurity — without documents, without financial means, and with serious risks of re-victimization or retaliation. Shelters are meant to provide safe accommodation, emergency assistance, and the stability needed for VoTs to begin rebuilding their lives. International best practice emphasizes that specialized shelters should be sensitive to the different needs of women, men, boys, and girls; staffed by trained professionals; and separate from immigration detention or unrelated facilities. At the same time, shelters must avoid unnecessary restrictions on victims' liberty, maintaining an empowering, trauma-informed environment.

Victim support extends beyond shelter service to include, at least, material support, medical care, psychological counselling, legal assistance, and access to education and vocational training. Effective reintegration measures, including access to employment, social services, and community support, are critical in reducing the risk of re-trafficking. Without such holistic support, even the most secure shelter can provide only temporary respite.

**The Role of Civil Society and Funding**

Non-governmental organizations (NGOs) play an indispensable role in the anti-trafficking landscape in the Western Balkans. The majority of specialized shelters are managed by NGOs, which often possess the expertise, flexibility, and victim-centered ethos that governmental structures lack. Both the Palermo Protocol and the CoE Convention explicitly recognizes the role of NGOs in providing assistance to victims, and all countries in the region have established forms of institutional cooperation with them. Yet, this cooperation is frequently undermined by unstable funding and short-term project-based financing, leaving NGOs and survivors in precarious positions.

Ensuring sustainable funding for shelters and victim support remains one of the most pressing challenges in the region. Donor support, while valuable, cannot substitute for systematic state financing. Stable, predictable funding frameworks—anchored in national budgets and complemented by donor contributions—are essential to guarantee durable and high-quality services. Equally important is the establishment of transparent licensing, monitoring, and quality-control mechanisms to ensure that services meet the needs of victims and align with international standards.

This mapping report aims to shed light on the current state of sheltering services and available support for VoTs in the Western Balkans, with a particular focus on funding modalities, sustainability, and integration into broader victim-centered systems. It seeks to contribute to a stronger, more coordinated, and more sustainable response to THB in the region. Ultimately, the protection of victims is not only a legal obligation but a moral imperative that requires sustained political will, adequate resources, and meaningful cooperation between governments, civil society, and international partners.

# Methodology

This report is designed as a mapping study with a regional scope, covering BiH, Serbia, Albania, North Macedonia, and Montenegro. The methodology was carefully structured to ensure a comprehensive and nuanced understanding of sheltering systems and services for VoTs, while also respecting the ethical considerations required when working with highly vulnerable groups.

The analysis focused on VoTs and the services intended for them in the period 2022-2024. It did not include individuals and groups generally vulnerable to THB, except to a limited extent irregular migrants moving (or staying) along the Balkan route. Although their numbers were significant in the previous decade, their trafficking experiences were often not recognized in practice. A broader and more in-depth consideration of preventive and support services for vulnerable groups would require different methodologies and tools, and falls beyond the scope of this mapping exercise.

The analysis combined a desk review of existing documentation with primary data collection through key informant interviews (KIIs) and interviews with trafficking survivors. This mixed-method approach enabled breadth of analysis, allowing for triangulation of findings across multiple sources. The study placed equal emphasis on institutional frameworks and lived experiences, recognizing that only by integrating both perspectives can an accurate picture of victim support systems be drawn.

The desk review covered national strategies, official reports and statistics, standard operating procedures (SOPs), guidelines, minimum standards, policies, and other relevant documents available in each country, as well as international reports (CoE country reports and TIP Reports) and publications issued by various national actors, primarily NGOs. This step provided the contextual background, identified existing obligations, and highlighted gaps or inconsistencies in the formal frameworks governing sheltering and victim support.

Primary data collection was organized around three categories of respondents:

1. Providers of shelters and specialized services for VoTs;
2. Government representatives responsible for policies and victim support mechanisms;
3. Trafficking survivors who had accessed shelter services.

For each respondent group, specific questionnaires were designed to address the central questions of the mapping exercise. The tools were developed to be uniform across the region, ensuring comparability of data while allowing for contextual flexibility.

**Key Research Questions**

The report was guided by a set of overarching questions exploring all stages of victim support. These included: the identification and referral of victims; the organization and capacity of shelters; licensing, regulation and quality control; funding and sustainability; the profile of beneficiaries; safety and risk management; length of stay and exit procedures; provision of specialized services; and reintegration

processes. The interviews also invited respondents to reflect on what an optimal system of sheltering and support would look like under current and realistic circumstances.

**Data Collection**

Respondents were selected with the assistance of local partner organizations to ensure both relevance and credibility. In total, 28 interviews were conducted with service providers and with government representatives, including national coordinators, agencies responsible for victim identification, and authorities working with migrants and asylum seekers. Specifically, 15 interviews were conducted with key informants from shelters and 13 with key informants from other relevant entities. Further, 16 interviews included NGO representatives and 12 government representatives. The number of respondents varied by country, reflecting the diversity and scale of national anti-trafficking systems. While efforts were made to reach as many relevant actors as possible, some invitees did not participate, primarily due to the timing of the fieldwork in June–August 2025, a period overlapping with summer holidays. A degree of research fatigue was also observed among stakeholders, which is unsurprising given the frequency of studies, surveys, and mappings in the region. Eleven trafficking survivors who had lived in shelters for VoTs at some stage of their recovery and reintegration also contributed to a better understanding of how shelter services function from the beneficiaries' perspective.

All KIIs were conducted online via the Zoom platform, in English or BHS, with interpretation provided by Albanian partners when needed. Survivors were interviewed exclusively by local service providers, in accordance with ethical protocols, ensuring that only adults at an appropriate stage of recovery participated. Participation was entirely voluntary, with written informed consent obtained in advance and kept by the local partners. Survivors were assured of anonymity, and no personal data that could enable identification were collected; all transcripts were coded to preserve confidentiality.

**Ethical Safeguards**

The study applied a trauma-informed, do-no-harm approach at every stage. Survivors were interviewed only by professionals already familiar to them, such as case managers, to enhance trust and minimize distress. The process emphasized safety, privacy, and psychological readiness, and interviewers were instructed to stop immediately if a participant showed signs of discomfort. Participation could be withdrawn at any point without explanation or consequence. These safeguards were essential in ensuring that survivors' well-being remained the priority throughout the research.

**Data Analysis**

All interview transcripts and notes were analyzed through interpretative methods, complemented by descriptive statistics for numerical data. This allowed for systematic categorization of findings and identification of recurring patterns, while still capturing the nuances of individual experiences and perspectives.

The analysis was implemented in three broad stages. The inception phase focused on preparation, including the development of tools and coordination with local partners. The second phase comprised

data collection through desk research and interviews. The final stage included analysis, validation, and report writing, with findings cross-checked and triangulated across the different data sources.

It should be noted that this mapping exercise did not assess the quality of the services provided, but only their availability, nor did it examine the impact on the quality of life of VoTs as service beneficiaries. As explained, the primary source of information was KIIs and desk research. To minimize the risk of misinterpretation, each country report was fact-checked by local partners. Since multiple sources were combined, references are generally not provided within the text but are included in the Annex.

**Methodological Principles**

Several principles guided the overall methodology:

- Integration of multiple sources**:** Desk review, KIIs, and survivor interviews were combined to ensure robust triangulation.
- Stakeholder engagement**:** Local partners played a central role in identifying respondents, and fact-checking and contextualizing findings.
- Comparability**:** Standardized tools were applied across countries to allow regional insights while respecting national particularities.
- Ethical integrity**:** A trauma-informed, rights-based approach underpinned all engagement with survivors.

## Comparative overview

All five countries under consideration–Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, and Serbia–are simultaneously countries of origin, transit, and destination for VoTs. In all five contexts, children are consistently prominent among identified VoTs, while migrants, especially those moving quickly, with limited trust and documentation, are chronically under-identified. The U.S. State Department's TIP Report classifications are broadly similar (Tier 2), reflecting persistent weaknesses in practice despite ongoing efforts to strengthen victim-centered approaches.

Across the region, the forms of exploitation largely mirror one another, with some local variations. Sexual exploitation remains the most prevalent, predominantly affecting women and girls. Forced begging and forced marriages are significant and highly visible, with Roma communities disproportionately affected. Forced criminality persists but remains under-explored, while labor exploitation has grown, most clearly in Serbia (including among foreign workers), and is increasingly recognized in BiH and Albania. Forced marriage appears in every country's context, sometimes minimized as "tradition". Men and boys appear in statistics but remain at the margins of service design. In all five countries, domestic citizens, especially those trafficked internally, constitute the majority of identified victims, although the number of foreign VoTs is gradually increasing. What differs across the region is not the nature of exploitation but the way in which states and their systems respond to it, particularly in how they conceptualize and organize victim protection, most notably support services for VoTs.

**Identification and Referral**

Although focused on support services, this analysis observes the identification of VoTs as an essential precondition for accessing rights and protection. The frameworks for identification in all five countries largely reflect the requirements of the Palermo Protocol and the CoE Convention: national referral mechanisms (NRM) are in place, trained professionals are responsible, procedures are not tied to criminal proceedings, and VoTs should have access to services regardless of their cooperation with law enforcement.

In all five countries, VoTs are recognized in two categories: potential/presumed victims[1], and formally identified victims. The former are individuals whose circumstances present sufficient indicators of THB, but whose formal identification has not yet been completed. The authority responsible for identification and the conditions for formal recognition of VoTs differ across countries. However, in all of them, both potential/presumed and formally identified VoTs have equal access to support services.

[1] The term "potential/presumed victims" is used throughout this report for consistency. Different countries apply different terminology, and some have shifted from one term to another in recent years. To avoid confusion, both terms are used together. Also, throughout the text, the term "victim" is used to refer to both potential/presumed victims and formally identified victims, unless otherwise specified.

Serbia has taken a social path to victim identification and assistance. The Centre for Trafficking Victims' Protection, established in 2012, recognizes both potential/presumed victims, reported by a broad range of actors, including NGOs, and confirmed victims under social welfare criteria, ensuring immediate protection without a criminal complaint. Any state or non-state actor who suspects THB may report their concerns to the Centre. In Montenegro, identification is done by a multi-disciplinary team, established in 2019, which has included an NGO representative since 2020. In BiH, formal recognition of VoTs rests solely with the judiciary, leaving police, social services, and NGOs to treat individuals only as potential/presumed victims. Albania divides the process into two phases: a wide range of actors, especially NGOs, may identify potential/presumed victims, but formal recognition requires a joint decision by the police and social services. In North Macedonia, the system was revised in 2021 and assigns responsibility to an Operational Team composed of state and NGO representatives.

The effectiveness of these models depends on proactivity. Albania and North Macedonia have invested in mobile identification units or teams, mainly led by NGOs, which actively seek out victims in vulnerable communities. These units remain underfunded and receive uneven support by the police, yet they detect the majority of cases. Elsewhere, practice is more reactive. In BiH, the absence of a harmonized procedure, combined with fragmented jurisdictional responsibilities, results in very few identifications. Serbia and Montenegro have better coordination for urgent protection but little systematic outreach.

Patterns of identification also reflect systemic blind spots. Children appear prominently in statistics across all countries, often accounting for half or more of identified victims, yet specialized child-protection procedures remain insufficient. In BiH, children consistently represent the majority of identified victims, primarily in cases of begging and child marriage. Serbia likewise records around half of all victims as minors each year, yet practice continues to show significant gaps in child-specific approaches, with responsibilities divided between the Centre for Trafficking Victims' Protection and social welfare centers. Albania reports high numbers of potential child victims annually, but formal recognition remains extremely low; indicators are sometimes over-applied, leading to inflated figures without corresponding protection. In North Macedonia, children are frequently identified by mobile teams but remain outside formal frameworks, while formally recognized cases involve mainly adults.

Migrants and foreign nationals remain systematically under-identified across the region. Albanian border police are legally required to conduct pre-screening but in practice classify most intercepted persons as irregular migrants, a practice reinforced by bilateral readmission agreements. In Serbia, cases of labor exploitation involving foreign workers are rarely treated as THB, as are forced marriages within migrant communities, which are often dismissed as cultural practices. In North Macedonia, foreign women in entertainment and sex work are regularly detected but seldom formally recognized as victims. Across all five countries, despite years of significant migration flows and reportedly trained first-line responders, only a handful of cases among irregular migrants have been registered, largely due to language barriers, mistrust, staff shortages and the speed with which migrants move on.

Statistics confirm these structural weaknesses. In Montenegro, only a small number of cases are formally recognized each year, despite clear indications of exploitation. In BiH, annual figures remain low and inconsistent, with children disproportionately represented and adult men rarely identified. Albania also demonstrates a gap between potential and formally recognized victims: while more than 160 potential victims were recorded annually in 2022–2024, only a handful obtained formal status. In North Macedonia, the number of formally recognized victims fluctuated sharply, with a sudden rise in 2024 largely involving

to foreign women, while children remained under-represented in official statistics. Serbia identifies the highest numbers in the region, but interviewees highlight persistent under-recognition of labor exploitation, migrant victims, and migrant women in forced marriages.

Taken together, identification and referral practices across the five countries illustrate a dual reality. On one hand, procedures exist, are anchored in legislation or SOPs, and guarantee access to services irrespective of prosecution. On the other hand, implementation remains inconsistent, under-identification is chronic, and specific groups—children, migrants, men and those in forced labor—continue to exist at the margins of protection systems.

**Legal and Policy Framework**

Each of the countries observed has established some form of legal and policy framework relevant to victim support. This framework is important because it defines how victims should be identified, referred, and assisted, demonstrating that protection is not left to discretion but embedded within national systems. The common building blocks are SOPs, strategic documents, and minimum standards, although their content, regularity of updates, and implementation vary from country to country.

All five countries have adopted strategic documents on combating trafficking in human beings, each containing provisions on victim protection. Montenegro's 2019–2024 Strategy refers to the financing of licensed shelters and indicators for the early recognition of victims. BiH's 2024–2027 Strategy regulates shelters, accreditation and financing, oversight, and the creation of a central register of victims. Albania's 2024–2025 Action Plan includes measures on identification, reintegration, and the sustainability of shelters. North Macedonia's 2021–2025 Strategy sets victim identification and referral, direct assistance, and reintegration as strategic priorities. Serbia's 2024–2029 Program for Combating Trafficking in Human Beings highlights strengthening the Centre for Trafficking Victims' Protection, establishing a shelter for men, and expanding psychological, legal and economic support. These references show that victim protection is formally integrated into national policy frameworks, even though implementation remains uneven.

All countries have adopted SOPs for the protection of VoTs, with the exception of BiH, where protection is defined instead through the Rules on the Protection of Victims of Trafficking in Human Beings who are nationals of BiH and the Rulebook on the Protection of Foreign Victims of Trafficking in Persons.

Approaches to minimum standards for victim protection differ across the region. BiH adopted its Minimum Standards for the Provision of Quality Assistance and Support to Victims of Trafficking only in 2023. Albania has had standards in place since 2007, later incorporated into the 2018 SOPs. North Macedonia regulates assistance through the Law on Social Protection and detailed rulebooks, complemented by reintegration program for adults and children. In Montenegro, minimum standards are included in the Law on Social and Child Protection and accompanying by-laws. In Serbia, the Centre for Trafficking Victims' Protection relies on its internal Rulebook on Identification and Coordination of Protection and other internal documents, which serve in practice until the adoption of a draft law envisaging stronger guarantees of victims' rights. Comprehensive minimum standards for victim support do not exist.

**Shelters**

The Palermo Protocol and the CoE Convention require states to guarantee victims secure accommodation and assistance tailored to their safety and recovery needs. These measures must apply to all victims, regardless of sex, age, nationality or type of exploitation. International guidance emphasizes that shelters should provide security without unnecessarily restricting liberty, and that VoTs should not simply be placed alongside survivors of domestic violence without adjustments for their specific vulnerabilities.

Shelters are 24-hour services and must be organized accordingly. Although there is no universal blueprint, experience shows that the environment should promote healing and stability, offering privacy, calm routines, access to healthcare and education, and opportunities for gradual reintegration. For children, specialized facilities or adapted foster care arrangements are essential to address developmental needs and trauma, yet such solutions remain limited across the region.

In practice, shelter provision in the observed countries is uneven in scope and quality. All five countries have at least some form of accommodation, but the number of facilities is low, capacities are small, and the gaps for children, men, foreign victims, and individuals with complex needs are acute. At current levels of identification, interviewees generally considered the number of places for women adequate, but large group cases quickly overwhelm existing capacity, prompting temporary solutions such as the use of hotels or rented flats.

The majority of specialized shelters for VoTs in the five countries are operated by NGOs. These NGOs are well-established organizations with decades of experience. In addition to managing shelters, they usually provide a broader range of support services for VoTs and/or other beneficiaries, such as victims of domestic violence, and they are active in numerous other fields, including prevention, policy development, monitoring and reporting, as well as awareness-raising and advocacy.

Albania maintains a mixed system consisting of one state-run shelter in Tirana and three NGO facilities (*Vatra*, Different and Equal, *Tjetër Vizion*), all licensed and members of the National Coalition of Anti-Trafficking Shelters (NCATS). The state center has the largest capacity (40 beds) and also admits men and boys, while NGO shelters focus on women, teenage girls, or children. All are formally closed or semi-closed: the state center with a 24-hour police presence, while NGOs maintain confidential addresses, controlled access, and private security. Staffing is multidisciplinary, typically ranging from 9 to 17 professionals, supplemented by part-time medical or teaching staff. Chronic shortages persist in specialized roles, and instability arises from dependence on a mix of state reimbursements and project-based funding. Periodic influxes of victims sometimes exceed capacity, forcing reliance on temporary accommodation.

BiH has quite extensive network, relying entirely on four NGO-run shelters (*Lara*, *Budućnost*, *Žene sa Une*, *Žene BiH*). These are primarily domestic violence shelters that also accommodate VoTs. They own their premises, ensuring stability, and offer between 20 and 32 places each. All admit women and children (boys and girls), and *Žene sa Une* also accepts men, making it the only mixed shelter in the country. Facilities are closed or semi-closed, with confidential addresses, 24/7 staffing, and surveillance. Admission is referral-based through prosecutors, police, or social welfare centers and consent-based for adults. Staff accompany residents to schools, health services, or court proceedings, sometimes with police escorts.

Minimum staffing standards (psychologist, social worker, lawyer, support staff) are met, but workloads are heavy, salaries depend on project funding and retroactive reimbursements, and staff burnout is common.

Montenegro has one NGO shelter for adult women in Nikšić, operated by SOS Hotline for Women and Children Victims of Violence, and a state shelter for children, opened in Podgorica in 2024. The NGO shelter, licensed for three beneficiaries, is an open-type service at a confidential address. It has a long history of assisting VoTs, including before formal licensing. It cannot admit children. The recruitment of licensed professionals is a persistent challenge. The state shelter for children has capacity for ten, but its location within a complex that also houses juveniles in conflict with the law has been criticized. Both facilities illustrate the constraints of scale and centralization: access is difficult for victims from other regions, and group cases overwhelm the system.

North Macedonia has only one specialized shelter, located in Skopje and operated by Open Gate/La Strada under government authority. Officially registered for ten but effectively limited to six beds, it admits women and girls over the age of 12 who possess residence permits. No accommodation exists for men or younger children. When needed, foster families or group homes are used, but these are not specialized for THB cases. The shelter operates with a multidisciplinary team exceeding the legal minimum, yet financial insecurity hampers staff retention. Despite its small scale, the service is specialized, consistent, and well-integrated into the NRM, which provides a level of coherence that some larger systems lack.

Serbia has two specialized shelters: the state Shelter for Victims of Trafficking, operated by the Centre for Trafficking Victims' Protection, and NGO *Atina*'s assisted housing service. The state shelter, opened in 2019 and licensed in 2022, has six places for women and girls over the age of 16 and their children. It is a closed facility with strict security measures, including cameras, secure entrances, and panic button connected to the police. Staff include psychologists, social workers, and pedagogues, but the shelter often struggles with complex psychiatric cases. Admission is available only through referral by the Centre. *Atina*'s assisted housing service, licensed in 2018 for six beneficiaries, is an open-type service that emphasizes independence, reintegration, and equal access and opportunities for participation and decision-making. Residents have freedom of movement and receive support from a small team of licensed professionals, supplemented by other staff. There are no specialized shelters for trafficked children or men. Children are placed in general childcare institutions or foster families, which are often relcutant to accept VoTs, and men are accommodated through ad hoc solutions such as rented flats or hostels.

All shelters cover the whole territories of their respective countries and report applying a victim-centered and rights-based approach, with accommodation based on consent. No category of VoTs is required to reside in a shelter. Staffing levels are often insufficient, with professionals overstretched due to limited and unpredictable resources and heavy workloads. Most shelters seek to provide psychological supervision for staff working directly with VoTs, although this depends on the availability of funds.

Taken together, shelters across the region show partial alignment with international standards. Secure and confidential accommodation is available for women, but services for men and children remain largely absent. Facilities come under strain when complex cases arise, and design and staffing rarely meet the ideal of promoting recovery alongside safety. The reliance on NGOs ensures professionalism and continuity, but financial instability and dependence on project-based funding undermine sustainability.

The result is a patchwork of services that provide essential protection yet remain inadequate to meet the full range of victims' needs.

**Licensing and standards**

Across the five countries, licensing and quality standards for shelters and related services exist in some form, although the frameworks vary significantly in scope, stability, and practical effect. In principle, licensing is intended to guarantee minimum quality, clarify responsibilities, and ensure accountability to beneficiaries. In practice, however, the processes are often bureaucratic, resource-intensive, and unevenly applied, creating a gap between regulatory requirements and actual service delivery.

Albania operates one of the more comprehensive licensing systems. Since 2007, shelters have been governed by the Standards of Social Care Services in Residential Centers for Trafficked Persons or Those at Risk of Trafficking. These standards cover accommodation, staffing, safety, case planning, rights protection and internal management. Licenses are granted permanently by the Ministry of Health and Social Protection. Licensing is accompanied by regular inspections, typically at least twice a year, and internal quality mechanisms such as anonymous complaint systems and beneficiary questionnaires. The standards were developed in cooperation with NGOs and are generally considered realistic and useful, though compliance requires significant administrative effort.

BiH does not have a formal licensing regime. Instead, the four NGO shelters operate on the basis of annual protocols with the Ministry of Security, which serve simultaneously as authorization and funding agreements. Minimum Standards and Criteria for the Selection of NGOs Providing Shelter and Assistance were introduced in 2022, but inspections remain superficial and primarily structural. Monitoring and quality control are limited to reporting requirements, with state inspections rare. In practice, internal mechanisms such as multidisciplinary teams and beneficiary feedback provide the main form of quality assurance.

Montenegro has a detailed framework governed by the Rulebook on the Closer Conditions for the Provision and Use, Norms and Minimum Standards of the Accommodation Service in Reception Centers and Shelters. Staff licensing is regulated separately, requiring providers to employ a set minimum number of licensed professionals. Licenses are issued for six years, though in some cases a restricted three-year license is issued where conditions are only partially met. NGOs describe the process as bureaucratic, costly, and overly focused on formalities, while state authorities view it as essential for ensuring clarity and control.

North Macedonia relies on a 2021 Rulebook regulating temporary accommodation for a wide range of vulnerable groups, including VoTs. The standards cover physical premises, minimum staffing, documentation, and services ranging from food and clothing to psychosocial and legal support. A license is valid for five years and requires at least two permanently employed licensed professionals. Quality control is formally ensured through inspections, although these occur infrequently, while internal supervision mechanisms exist but are constrained by limited resources. Licensing does not guarantee funding, and the sustainability of the sole specialized trafficking shelter continues to depend on external support.

Serbia recognizes VoTs as a specific category of social protection beneficiaries under the Law on Social Protection. The Rulebook on Standards and Conditions for the Provision of Social Protection Services provides for specialized accommodation for VoTs and SOS hotlines for women with the experience of violence as the only standardized services for VoTs. Licenses are issued for the period of six years. The Rulebook on Licensing of Professional Workers in Social Protection sets individual licensing requirements for staff. *Atina* was the first to obtain a license for a specialized accommodation service in 2018, followed by the state shelter in 2022. The process is widely described as complex and burdensome, involving extensive documentation, inspections, and high administrative costs. While licensing confers formal recognition and visibility, it does not provide state funding. NGOs in particular face strict scrutiny and protracted renewal procedures. Quality control is exercised primarily through reporting obligations and, less frequently, inspections, with internal beneficiary evaluations compensating for many of the gap.

Taken together, these systems show that while all countries formally recognize the need for standards and licensing, implementation remains uneven. Albania appears to have the most stable model, combining permanent licensing with regular inspections. Montenegro and Serbia have detailed frameworks with processes that NGO actors describe as discouraging and overly bureaucratic. Serbia is the only country in which a licensed service for VoTs receives no state funding. North Macedonia has codified requirements but lacks funding guarantees. BiH continues to operate through contractual arrangements rather than structured accreditation.

In all cases, standards for core shelter services exist, but quality control is limited, and specialized standards for services beyond accommodation are underdeveloped or absent altogether. The result is that licensing ensures a formal baseline but rarely translates into comprehensive quality assurance or genuine stability for service providers.

**Funding**

From the early days, shelters and support services for VoTs in the region have relied almost entirely on international donors, with the expectation that governments would gradually assume responsibility. That transition has only partly occurred. State funding mechanisms now exist in all countries to some degree, but they are characterized by unpredictability, insufficiency, and dependence on annual budgetary cycles. As a result, sustainability remains fragile, and donor support continues to fill critical gaps.

Sustainability, defined by sufficient and predictable funding, is a core prerequisite and standard for operating a shelter service.

Albania allocates funds to both the state-run shelter and the three NGO/operated facilities, but covers only the costs of food and staff salaries in the NGO shelters. Support services and reintegration programs are only partly financed, and the system does not extend to community-based organizations. Donor contributions therefore remain indispensable for activities such as vocational training, psychotherapy, prevention, and follow-up work, leaving overall sustainability uncertain.

BiH reimburses shelters through annual protocols with the Ministry of Security. These agreements serve both as authorization and funding contracts, but payments are retroactive, unpredictable, and often delayed until late in the year. The level of reimbursement fluctuates with the budget and rarely meets

actual needs. As a result, shelters rely on cross-subsidies from domestic violence funds or donor-supported projects to maintain staff and services.

Montenegro provides annual allocations to the licensed NGO shelter for women, supplemented by reimbursements from social welfare centers for each individual placement. This model secures a predictable base of income but does not compensate for the upfront expenses of licensing. The state shelter for children, as a public institution, is financed through the national budget. Despite these arrangements, NGOs describe the system as fragile and competitive, leaving them dependent on donors for long-term stability.

North Macedonia provides limited support through the Ministry of Social Policy, Demography and Youth, covering utilities and reimbursing a portion of costs per beneficiary. This contribution helps maintain basic operations but falls far short of covering 24/7 staffing, healthcare, or reintegration activities. The shelter therefore continues to rely on international donors for most of its programming.

Serbia fully finances the state-run shelter through the national budget as part of the social welfare system. By contrast, *Atina*'s assisted housing service, despite being licensed, receives no state funding and operates entirely on donor contribution and income from its social enterprise. This situation exposes a structural gap: licensing confers formal recognition but does not guarantee financing, leaving NGO-run services particularly vulnerable.

Across the region, the pattern is consistent: governments contribute to core shelter costs, but allocations are partial, unpredictable, or tied to occupancy. No system ensures comprehensive, sustainable financing, and the burden of filling funding gaps continues to fall on international donors and the organizations themselves.

When asked about ideal funding models, few service providers could look beyond the daily struggle of covering basic expenses. Predictability, regularity, and flexibility were the only articulated ideals. Multi-year contracts, adequate per diem rates, and clear budget lines would provide a baseline of stability. Until such reforms are introduced, shelters will remain caught in a cycle of fragile commitments, donor dependence, and chronic financial insecurity.

**Services at the Shelter**

All five countries provide a broadly similar package of services in their shelters. Victims are offered safe accommodation, food, clothing, psychological support, legal and administrative aid, medical care, and opportunities for education and vocational training. The approach is based on case management, with individual assistance plans developed jointly with beneficiaries. Shelters also aim to establish a structured daily routine through counselling, workshops, cultural or recreational activities, and reintegration support.

Despite this shared framework, the scope and quality of services vary depending on funding, staffing, and local partnerships. Access to medical care, for example, often relies on cooperation with public health institutions, but delays and uneven coverage are common. Psychotherapy is usually available only through private providers, often financed by donors. Legal aid may be provided by pro bono lawyers or through state-funded programs, but its availability is inconsistent. Educational support is better developed for

children, with schools engaged to ensure continuity, while vocational training and employment support for adults are more sporadic and largely often dependent on external projects. Economic empowerment and long-term housing solutions remain among the weakest areas across the region.

Specialized services for specific groups are limited. Shelters for men are absent in most countries, forcing *ad hoc* arrangements. Services for children are more developed but uneven, with some facilities offering full educational programs and others relying on external schools. Children with complex behavioral or mental health needs are particularly difficult to accommodate, as no specialized facilities exist. Adequate programs and alternative options for VoTs with severe mental illness or substance-use disorders are also lacking, leaving shelter staff to manage complex cases without specialized support and, at times, forcing them to admit beneficiaries they are not equipped to assist.

The duration of stay is formally regulated in most countries, typically ranging from six months to one year. In practice, stays are highly flexible and depend on individual needs, the progress of court proceedings, or the availability of reintegration options. For adults, the average stay is usually under one year, though extensions are common when victims are not yet ready for independent living. For children, stays tend to be much longer. In several cases, children have remained for years in shelters due to the absence of safe family alternatives, specialized foster families, or suitable social welfare placements. In BiH and North Macedonia, some children have stayed until reaching adulthood; in Albania, some minors have spent several years, occasionally up to a decade, in the same shelter.

Exit pathways are broadly similar across countries: reintegration into the family, placement in foster care, transfer to another social welfare institution, independent living supported by a community program, or assisted voluntary return abroad. Yet long-term reintegration support remains weak everywhere, and many victims, particularly children without safe families and foreign nationals who do not wish to return home, face uncertain futures once they leave shelters.

Overall, the pattern is consistent across the region: shelters provide a comprehensive set of core services and show considerable flexibility regarding the duration of stay, but the quality and sustainability of specialized support remain uneven, and long-term solutions are inadequate. This reflects both limited state funding and the dependence on external projects to fill gaps, leaving victims vulnerable once short-term protection ends.

**Reintegration**

Reintegration is a structured process aimed at supporting VoTs in rebuilding their lives through recovery, economic independence, and equal access and opportunities for participation and decision-making. It requires a safe and stable environment, access to basic needs, opportunities for education and employment, and sustained psychological and social support. Successful reintegration is best achieved through a phased and multidisciplinary approach that ensures both immediate stabilization and long-term independence.

Reintegration is widely recognized across the region as the weakest component of the support system for VoTs. While shelters provide some reintegration elements during accommodation, such as education, vocational training, psychosocial support, preparation for independent living, or work with families and

communities, structured aftercare and long-term follow-up remain largely absent or severely underdeveloped.

In practice, NGO-run shelters try to fill this gap by offering semi-independent living arrangements, vocational training, and employment counselling. In Albania, organizations such as Different & Equal and *Vatra* support victims in rented apartments and maintain contact for years after shelter stays, while *Tjeter Vizion* and Mary Ward Loreto provide follow-up through daily centers and outreach services. In BiH, *Budućnost* is notable for visiting former beneficiaries soon after departure and linking them with agricultural or factory employment, while *Lara* has built a network of employers and offers job-seeking support. However, these activities often target survivors of domestic violence rather than VoTs, most of whom are children. In Serbia, *Atina*, whose main focus is reintegration into society, maintains long-term contact with former residents and runs outreach and daily support programs, including its social enterprise *Bagel Bejgl*, where beneficiaries gain work experience and develop labor market skills. Still, opportunities outside Belgrade remain scarce. In North Macedonia, Open Gate continues to assist beneficiaries after they leave the shelter, supporting them with schooling and medical treatment, although the absence of transitional housing or halfway homes limits the scope of reintegration. In Montenegro, the SOS Hotline for Women and Children Victims of Violence Nikšić shelter supports education and employability during the stay, but follow-up afterwards is minimal, as social welfare centers lack the capacity for sustained case management.

Despite these efforts, reintegration remains undermined by systemic gaps. Housing support is inadequate, with few options beyond temporary rented flats financed through donor projects. Employment prospects are uncertain due to limited labor market opportunities and persistent stigma. Children face particular barriers: reintegration into schools is difficult for those exploited through begging or forced marriage, and specialized services for minors with mental health or behavioral issues are largely absent. For adults, especially those with low skill levels, reintegration is often short-lived, and some are re-trafficked after leaving shelters due to ongoing economic vulnerability.

Across all five countries, reintegration depends heavily on NGO initiative and donor funding rather than on state systems. Social welfare centers and employment services are formally responsible but lack both the resources and the expertise to provide sustained support. Follow-up contact often relies on the goodwill and persistence of shelter staff rather than on institutionalized mechanisms. As a result, the majority of VoTs leave shelters without a clear path toward long-term stability, facing heightened risk of marginalization, poverty, and renewed exploitation.

The pattern is therefore consistent: while the crisis phase of recovery is relatively well managed through shelter services, the transition to independent life remains fragile and rarely sustainable. Reintegration continues to be the missing link in protection systems, leaving most of VoTs without the long-term support they need to rebuild their lives.

# Country Reports

## Albania

Albania is a country of origin, transit and destination for THB, with a significant share of internal THB. The majority of identified VoTs are children, with sexual exploitation as the most prevalent form, primarily affecting girls, and forced begging as the second most common, largely involving boys. Other forms of exploitation include forced labor, forced criminality and, to a lesser extent, forced marriage. Albanian victims are trafficked to Kosovo, Italy, Greece, the United Kingdom, France, Germany, and Switzerland. The number of foreign nationals identified has risen sharply, with victims originating from Belarus, Ukraine, Kosovo, Italy, Latin America, Africa and Asia. In the U.S. Department of State's 2025 Trafficking in Persons Report, Albania was classified as Tier 2

**Identification and Referral**

The NRM, first established in 2005 and last revised in 2023, provides the framework for identification and referral of VoTs. SOPs divide the process into two phases: initial identification of potential/presumed victims, which can be carried out by a broad range of actors including NGOs, and formal identification, which is jointly undertaken by a police officer and a social worker or child protection specialist. Both formally identified and potential/presumed victims have access to support services. Fifteen institutions are part of the Responsible Authority under the NRM, including key NGOs such as NCATS, Mary Ward Loreto, Nisma ARSIS, Terre des Hommes, World Vision Albania and other members of URAT (United Response against Trafficking) Network.

Mobile Identification Units, composed mainly of NGO social workers, play a crucial role in proactive detection. Their number has grown to nine, covering key areas where vulnerable populations are concentrated. Despite their importance, they remain chronically underfunded and understaffed, and police participation, although formalized by a memorandum of understanding, is often inconsistent. As a result, NGOs continue to identify the majority of victims. While Albania records high numbers of potential/presumed victims each year, the number of those formally identified remains very low, reflecting both reluctance and inconsistency in granting formal status.

Concerns persist regarding the identification of migrants, asylum seekers and minority groups. Although legislation requires pre-screening at borders, including assessment of whether intercepted foreigners may be potential/presumed victims, in practice border police often classify them as irregular migrants without deeper assessment. This is particularly important in view of agreements on admission of migrants the Albanian government has signed with foreign countries, such as Italy. At the same time, some actors over-apply indicators in relation to vulnerable children, granting them potential/presumed victim status in the absence of evidence of exploitation. This produces inflated figures while genuine cases remain overlooked. NGOs emphasized that while the NRM is formally functional, coordination in practice depends largely on informal networks between NGOs.

**Table 1. Victims of Trafficking in Albania, 2022–2024**

| | 2024 | 2023 | 2022 |
|---|---|---|---|
| **Potential/presumed victims** | **163** | **164** | **110** |
| **Formally identified victims** | **15** | **1** | **2** |
| **By sex** | | | |
| Female | 113 | 115 | 81 |
| Male | 65 | 50 | 31 |
| **By age** | | | |
| Adults | 82 | 56 | 38 |
| Children | 96 | 109 | 74 |
| **By nationality** | | | |
| Albanian | 126 | 161 | 109 |
| Foreign | 52 | 4 | 3 |
| **By type of exploitation** | | | |
| Sexual | 70 | 80 | 60 |
| Begging | 59 | 60 | 37 |
| Labor | 16 | 3 | 5 |
| Criminality | 33 | 20 | 9 |
| Forced marriages | - | 2 | 1 |

Source: GRETA, Fourth Evaluation Report

**Legal and Policy Framework**

Assistance to VoTs is primarily governed by the 2018 Standard Operating Procedures for the Protection of Victims and Potential Victims of Trafficking. The SOPs are based on a human-rights approach and the best interests of the victim, guaranteeing assistance irrespective of cooperation with law enforcement. They regulate identification, referral, accommodation, legal aid, rehabilitation, reintegration and assisted

voluntary return, with specialized provisions for children and foreign victims. Indicators for child and adult victims are specified for border authorities, schools, health institutions, labor inspectorates and social services.

The National Action Plan for Combating Trafficking in Persons 2024–2025 sets out priority measures related to timely identification, comprehensive assistance, strengthened mobile units, dedicated legal and psychological services, improved witness protection and long-term reintegration. The Plan underlines a victim-centered approach that is sensitive to the different needs of women, men, boys, and girls, and emphasizes sustainability of funding for specialized shelters and services.

**Licensing and Standards**

Albania has a formal licensing system for all service providers. Since 2007, shelters and community-based services for VoTs have operated under the Standards of Social Care Services in Residential Centers for Trafficked Persons or Those at Risk of Trafficking, adopted by government decision. These standards cover comprehensive assistance, care planning, rights and responsibilities, data protection, internal management, staffing, safety and security, physical conditions, networking and monitoring. Licenses are granted permanently, with no renewal requirement, by the Ministry of Health and Social Protection.

Licensing is mandatory for all service providers, with separate categories for community-based and residential services. Although permanent, licenses are subject to regular inspections by state social services. Interviewees reported that at least two inspections take place annually, and breaches must be remedied within a prescribed timeframe. The standards were developed in cooperation with civil society and are considered realistic and necessary.

Quality control is ensured through a dual system of external inspections and internal complaints mechanisms. Shelters maintain anonymous complaint boxes, some accessible only to inspectors, and distribute anonymous questionnaires to beneficiaries to evaluate services.

**Shelters and Service Providers**

Four specialized shelters provide accommodation for VoTs in Albania. These are the state-run National Reception Centre for Victims of Trafficking in Tirana and three NGO-run facilities: *Vatra* in Vlora, Different & Equal in Tirana, and *Tjeter Vizion* in Elbasan. All these shelters were established in early 2000s, often developing from the programs operated by international or foreign organizations. Together they form the NCATS, which plays a central role in the NRM and coordinates referrals and service provision.

In certain situations, potential/presumed VoTs, both adults and children, may be accommodated in a safe emergency shelter operated by the Initiative for Social Change (ARSIS) in cooperation with the Municipality of Tirana, providing short-term assistance for up to 11 days, or in a smaller number of cases through the Center for Protective, Empowering, and Emergency Services for Children and Families in Durrës, run in partnership with World Vision Albania and the Municipality of Durrës.

In addition, VoTs may receive assistance through community-based services run by NGOs such as Mary Ward Loreto, which provide non-residential support and follow-up after shelter stay.

**Table 2. Assisted Victims of Trafficking in Albania, 2022–2024**

| | 2024 | 2023 | 2022 |
|---|---|---|---|
| **Newly assisted victims** | **178** | **162** | **121** |
| **By sex** | | | |
| Female | 115 | 116 | 85 |
| Male | 63 | 46 | 36 |
| **By age** | | | |
| Adults | 82 | 54 | 43 |
| Children | 96 | 108 | 88 |

Source: GRETA, Fourth Evaluation Report

The shelters are licensed under national standards. They provide crisis accommodation, rehabilitation and, in some cases, longer-term reintegration. Capacities range between 14 and 40 beds, though admissions fluctuate depending on available resources and sudden influxes of victims, particularly foreign nationals. The state-run National Reception Centre for VoTs has the largest capacity (40 beds), while NGO shelters range between 15 and 20 places, with portions reserved for children. Although the majority stated that at the current level of identifications these capacities are sufficient, interviewees noted that in practice available beds are sometimes insufficient, particularly when police identify large groups of victims in a single operation. In such cases, shelters resort to temporary solutions such as portable beds, hotel accommodation or rented flats.

**Table 3. Victims in *Tjeter Vizion* Shelter, 2022–2024**

| | | 2024 | 2023 | 2022 |
|---|---|---|---|---|
| **Total (children)** | | **22** | **19** | **23** |
| | Girls | 13 | 11 | 13 |
| | Boys | 9 | 8 | 10 |

| | | | |
|---|---|---|---|
| **By nationality** | | | |
| Domestic | 21 | 18 | 21 |
| Foreign | 1 | 1 | 2 |
| **Internal vs cross-border** | | | |
| Internal THB | 21 | 18 | 21 |
| Cross-border THB | 2 | 1 | 1 |

Source: *Tjeter Vizion*

NGO-run shelters accommodate women (Different & Equal), women and teenage girls (*Vatra*) or children (*Tjeter Vizion*, which had to shut down the shelter for adults due to the lack of funding), while the state-run facility also admits men and boys. In theory, foster care can be used for children, but in practice the number of foster families is very limited, and most minors remain in institutional accommodation. The admission process is referral-based, usually through police, social services or child protection units, and is consent-based for adults. For children, admission is decided by the child protection unit, with the child's consent also sought where possible. Individuals with severe psychiatric conditions or acute addiction are difficult to accommodate due to lack of specialized facilities, although shelters sometimes admit them out of necessity, creating additional strain.

**Table 4. Victims in *Vatra* Shelter, 2022–2024**

| | 2024 | 2023 | 2022 |
|---|---|---|---|
| **Total** | **60** | **54** | **46** |
| Female | 56 | 51 | 44 |
| Male | 4 | 3 | 2 |
| **By age** | | | |
| Adults | 35 | 31 | 27 |
| Children | 25 | 23 | 19 |
| **By nationality** | | | |
| Domestic | 37 | 54 | 46 |
| Foreign | 23 | 0 | 0 |

| | | | |
|---|---|---|---|
| **Internal vs cross-border** | | | |
| Internal THB | 37 | 54 | 46 |
| Cross-border THB | 23 | - | - |

Source: *Vatra*

All shelters operate as closed or semi-closed facilities. The National Reception Center is formally closed, with 24-hour police presence and strict surveillance, while NGO shelters maintain confidential addresses and apply controlled entry, with private security or camera systems. Staff accompany residents to schools, medical appointments or court proceedings, and in some cases police escorts are arranged following risk assessment. Locations are officially confidential, although in practice anonymity is difficult to maintain in smaller towns.

Staffing follows national minimum standards, requiring a multidisciplinary team composed of social workers, psychologists, lawyers, medical staff and support workers. In practice, shelters employ between 9 and 17 professionals depending on their size, often supplemented by part-time doctors, nurses or teachers. Staffing levels are considered the bare minimum, and NGOs report chronic shortages, particularly in specialized roles such as legal aid, clinical psychology and security staff. Salaries are tied to state reimbursement (for national minimum standards) and project funding (for extra staff), creating instability and reliance on short-term contracts. Staff turnover, workload and burnout are persistent challenges, despite efforts to maintain professional supervision.

**Table 5. Victims in the National Reception Center for Victims of Trafficking, 2022–2024**

| | | 2024 | 2023 | 2022 |
|---|---|---|---|---|
| **Total** | | **35** | **17** | **20** |
| **Adults** | | **20** | **5** | **5** |
| | Female | 19 | 17 | 20 |
| | Male | 16 | - | - |
| **Children** | | 15 | 12 | 15 |
| | Female | n/a | 12 | 15 |
| | Male | n/a | - | - |

Source: National Reception Center for Victims of Trafficking

Overall, the shelter system provides a crucial safety net, but faces limitations in capacity, staffing and resources, especially in addressing complex cases and ensuring long-term solutions for men, boys and foreign nationals.

Mary Ward Loreto complements this system through advice and service centers nationwide, which provide housing assistance, psychological support, legal aid and job mediation. Its approach is often critical for victims reluctant to enter shelters, or for those who require follow-up support after leaving institutional accommodation.

**Funding**

All shelters receive some level of state funding. State allocations increased significantly in 2023 and 2024, with more than EUR 240,000 granted to the state-run shelter and between EUR 90,000 and EUR 120,000 to each NGO shelter. However, even with these increases, state contributions represent only a fraction of overall budgets. For instance, one NGO shelter's budget exceeds EUR 300,000 annually, of which only about a quarter is covered by government funds. Donor dependency therefore remains high, and the withdrawal of major U.S funding donors has created additional strain. Unlike domestic violence shelters, trafficking services are not fully covered by state budgets, making their sustainability precarious.

Mary Ward Loreto receives no state funding and relies entirely on international donors and its own fundraising, raising concerns about the continuity of its community-based services. All providers emphasized the need for multi-annual and flexible funding arrangements, rather than project-based and retroactive reimbursements.

**Services at the Shelter**

The range of services available in shelters is relatively comprehensive. Victims are provided with food, clothing, safe accommodation, medical care, counselling, legal aid, education, vocational training, social activities and reintegration assistance.

Therapeutic and educational activities form a key part of daily routines, including counselling, workshops, cultural outings and occupational therapy. NGO shelters place strong emphasis on vocational training and employment support, recognizing that sustainable livelihoods are central to reintegration. Foreign victims are assisted in applying for residence or work permits and, where appropriate, supported with voluntary return.

Multidisciplinary teams typically include social workers, psychologists, lawyers, doctors and support staff. Case managers develop individual assistance plans in consultation with victims. Shelters such as Different & Equal emphasize structured daily activities, including therapy, workshops, cultural outings, and group sessions. *Tjeter Vizion* provides full educational support for children, covering school materials and extracurricular activities. *Vatra* combines residential and community programs, offering long-term reintegration through rented apartments, vocational courses, family empowerment and legal aid. The National Reception Centre provides medical, legal and psychological services but does not cover schooling, which is conducted within the shelter.

According to interviewees, shelters cooperate closely with schools, health institutions, employment offices, municipalities and private companies to secure access to services, having in mind insufficient funding. However, medical and legal services are unevenly available and depend heavily on external providers. Economic empowerment and long-term housing support remain particularly weak areas, leaving many victims vulnerable after leaving shelters.

**Safety and Duration of Stay**

All shelters apply strict safety measures as required by national standards, though the level of security varies. The state-run National Reception Centre is a closed facility, guarded 24 hours by police, with physical barriers, controlled access, and strict confidentiality rules. NGO shelters operate as closed or semi-closed facilities, with camera systems or private security, and maintain confidential addresses. Nevertheless, in smaller towns, anonymity is often difficult to maintain and incidents of unwanted visits have occurred in the past. Risk assessments are required under national standards and are conducted on admission and repeated when circumstances change, although interviewees reported inconsistent application, especially by state authorities.

Accommodation is provided on a voluntary basis for adults and they may leave the shelter at their own request, subject to a risk assessment. For children, admission and exit decisions are made by municipal child protection units, with the child's views taken into account where possible. In some cases, police or prosecutors are involved, particularly when safety risks are high or criminal proceedings are ongoing. Shelters reported that beneficiaries sometimes leave prematurely, despite security concerns, but formal waivers are used in such situations.

Duration of stay varies considerably. NGO shelters usually apply a phased approach, beginning with emergency accommodation of three to six months, followed by a reintegration stage that can last from one to three years, including semi-independent living arrangements in rented flats. Some beneficiaries remain in contact with shelters for up to five years through structured follow-up.

At the *Tjeter Vizion's* shelter, children stays have extended for three to five years due to the lack of alternative arrangement, including one child for up to a decade. *Vatra* on average accommodates victims for six months to a year. The National Reception Center is formally limited to rehabilitation and crisis intervention, with average stay of one year, but in practice accommodates both adults and children for longer when necessary. Individual cases have remained for several years, particularly children without family alternatives and foreign nationals awaiting return or residence permits.

Exits from shelters occur when security risks are considered manageable, when beneficiaries request to leave, or when conditions for reintegration are met. For children, the most common exit pathways are return to family, placement in foster care, or transfer to another social welfare institution. For adults, options include return to family, relocation to a rented apartment under a community reintegration programs, or assisted voluntary return abroad. Foreign VoTs often request repatriation, which is arranged through coordination between shelters, the NRM, and the Ministry of Interior.

Overall, while the system provides flexibility in duration of stay and multiple exit pathways, the interviewees emphasized gaps in sustainable long-term solutions, particularly for children without safe families, men and boys, and foreign nationals who do not wish to return to their countries of origin.

**Reintegration**

Reintegration remains the weakest element of Albania's support system. Although NGO shelters provide structured reintegration programs, resources are limited. Different & Equal and *Vatra* support semi-independent living in rented apartments, provide vocational courses, and maintain follow-up for several years. *Tjeter Vizion* offers reintegration services through its daily center, vocational training, and partnerships with local employment offices, but lacks sufficient staff for long-term monitoring. Mary Ward Loreto plays significant role in aftercare support

Obstacles include insufficient housing support, limited municipal assistance, unemployment and persistent stigma. Victims who have stayed in shelters often face discrimination when seeking jobs or housing in their communities. Children and victims with complex needs, such as mental health problems or drug dependency, face particular challenges, with few specialized facilities available. Generally, NGO shelters attempt to mitigate the gaps through outreach and mobile teams, maintaining contact with survivors for years after accommodation

The National Reception Centre does not run reintegration programs, though it refers beneficiaries to other organizations. Interviewees noted that some victims, especially adults, are re-trafficked after leaving due to economic instability and lack of sustained support.

**Recommendations by interviewees**

Interviewees identified several priority areas:

- **Identification**: Improve screening of migrants and vulnerable groups at borders and in communities, ensure proper application of indicators, and avoid over-identification of children whose vulnerabilities are not linked to exploitation.
- **Financing**: Increase and stabilize state funding for shelters, ensuring coverage of all operational and reintegration costs, not only salaries and food; introduce multi-year agreements to reduce dependence on donors.
- **Services**: Expand specialized services for men and boys, including dedicated shelters or community programs, and strengthen mental health and addiction support for all categories of victims.
- **Reintegration**: Strengthen long-term reintegration services, including housing, vocational training, employment, and psychological support, with special attention to children, men, and victims with complex needs.
- **Legal framework**: Consider adopting a comprehensive anti-trafficking law to consolidate fragmented regulations and clarify institutional responsibilities.

## Bosnia and Herzegovina

Bosnia and Herzegovina is a country of origin, transit, and destination for THB. VoTs are exploited for sexual exploitation, forced begging, forced criminality, labor exploitation, and forced marriages. In recent years, foreign victims have included nationals of Croatia, the Philippines, Slovenia, Uruguay. Women and girls from other European countries remain vulnerable to sexual exploitation inside BiH, while BiH citizens are trafficked for sexual exploitation and forced labor across Europe. Irregular migrants and refugees from Afghanistan, Iran, Iraq, Morocco, Pakistan, Syria and neighboring states, who transit or remain stranded in BiH, are at particular risk, especially women and unaccompanied children. In the U.S. Department of State's 2024 Trafficking in Persons Report, BiH was classified as Tier 2

**Identification and Referral**

The system of identification and referral of VoTs in BiH is fragmented and inconsistent across jurisdictions. By law, only judicial authorities can formally recognize a VoT, while other actors—including police, social welfare centers and NGOs—may treat individuals as potential/presumed victims. Two legal instruments regulate the process: the Rules on the Protection of Victims of THB who are nationals of BiH, and the Rulebook on the Protection of Foreign Victims of Trafficking in Persons.

Suspected cases are reported to the State Investigation and Protection Agency (SIPA) and the competent prosecutor's office; for foreign nationals, the Service for Foreigners' Affairs (SFA) is responsible. VoTs are usually granted the status of potential/presumed victim, and may be referred to accredited shelters by prosecutorial order.

In practice, procedures are unclear and under-applied. Interviewees highlighted the absence of harmonized rules and a central database, resulting in inconsistent practices and unreliable statistics. Under-identification remains significant, especially among children in forced begging and early marriages, as well as among irregular migrants. Despite heavy migration flows since 2018, only a handful of THB cases have been detected, attributed to language barriers, lack of trust in authorities, staff shortages and the rapid onward movement of migrants.

Between 2022 and 2024, around 30–37 potential/presumed VoTs were recorded annually, with children consistently forming the majority. Girls were particularly over-represented, while few adult men were identified.

**Table 6. Victims of Trafficking in Bosnia and Herzegovina, 2022–2024**

| | | 2024 | 2023 | 2022 |
|---|---|---|---|---|
| **Total** | | **37** | **32** | **37** |
| | Female | 16 | 22 | 28 |

| | | | | |
|---|---|---|---|---|
| | Male | 21 | 10 | 9 |
| **Adults** | | **12** | **7** | **7** |
| | Female | 5 | 7 | 6 |
| | Male | 7 | 0 | 1 |
| **Children** | | **25** | **25** | **30** |
| | Female | 11 | 15 | 22 |
| | Male | 14 | 10 | 8 |

*Source:* Ministry of Security

According to the Ministry of Security, of all victims, 75.7% were in need of a shelter in 2022, 62.5% in 2023, and 64.9% in 2024.

## Legal and Policy Framework

Victim support is formally regulated through the Rulebook on the Protection of Foreign Victims of Trafficking in Persons and the Rules on the Protection of Victims who are nationals of BiH. Both establish right to shelter and a wide range of services, though implementation is uneven.

For foreign VoTs, placement in a shelter by SFA brings access to urgent medical care, psychological support, legal advice on status, vocational training, the labor market, and repatriation support. The authorities must take into account age, sex and special needs, especially for children.

For BiH nationals, rules provide for safe housing, medical and psychological care, legal aid, education, vocational training, social protection, and special protection for children and vulnerable groups. In authorized NGO-run safe houses, additional services such as transportation, clothing, food, hygiene, counselling and occupational therapy are foreseen.

In 2023, Minimum Standards for the Provision of Quality Assistance and Support to Victims of Trafficking were adopted, covering accommodation, living conditions, education, health, reintegration, rights, information, and privacy. However, the interviewees emphasized that these standards are not yet widely applied in practice.

Despite a relatively comprehensive framework, assistance outside shelters remains limited. GRETA has repeatedly highlighted the absence of state-funded structures beyond safe houses and the lack of resources in social welfare centers, problems that interviewees confirm continue today.

The 2024–2027 Strategy for Combating Trafficking in Human Beings in Bosnia and Herzegovina sets out a comprehensive approach to victim protection, including regulation of shelters, accreditation and financing, oversight, and the creation of a central register. It emphasizes a victim-centered and standardized system, availability of accommodation within 72 hours of identification in all entities, cantons, and the Brčko District, specialized measures for children and women, and monitoring of access

to education, healthcare, legal advice, repatriation, and reintegration. However, while the Federation of BiH's Action Plan foresees improvements through the forthcoming Law on Social Services, the Action Plan of Republika Srpska does not contain specific provisions on shelters.

**Licensing and Standards**

There is no formal licensing system for shelters for VoTs in BiH. Instead, four NGO-run shelters operate under annual cooperation protocols with the Ministry of Security. These protocols, renewed through yearly public calls, act simultaneously as authorization and funding contracts. Only shelters with signed protocols may receive state reimbursements for victims accommodated, although there is no formal restriction for placing victims in unauthorized shelters.

Although Minimum Standards and Criteria for the Selection of CSOs Providing Shelter and Assistance were adopted in 2022, the interviewees explained that checks of premises and staff capacities were superficial and limited to the fulfilment of structural requirements. The system functions more as a contractual arrangement than structured licensing scheme. Having in mind that all shelters accommodated both VoTs and victims of domestic violence, those located in Republika Srpska apply standards developed for the latter as they are more demanding.

Monitoring and quality control are limited. Shelters must submit annual reports on beneficiaries and financial accounts, but state inspections are infrequent and irregular. Internal mechanisms—multidisciplinary teams and victim feedback forms—remain the main form of oversight.

**Shelters**

Currently, four NGO-run shelters accommodate VoTs in BiH. These are shelters run by *Lara* Foundation in Bijeljina, citizens' association *Budućnost* in Modriča, association *Žene sa Une* in Bihać, and association *Žene BiH* in Mostar. All also serve victims of domestic violence.

These organizations are among the most experienced NGOs in the country, active since the early 2000s. They operate in premises they own, ensuring stability and continuity. Capacities range from 20 to 32 beds, with portions allocated for VoTs.

**Table 7. Victims in *Lara* Shelter, 2022–2024**

| | 2024 | 2023 | 2022 |
|---|---|---|---|
| **Total** | **3** | **10** | **4** |
| Female | 3 | 6 | 3 |
| Male | - | 3 | 1 |

| | | | |
|---|---|---|---|
| **By age** | | | |
| Adults | - | 1 | - |
| Children | 3 | 9 | 4 |
| **By nationality** | | | |
| Domestic | 3 | 9 | 4 |
| Foreign | - | 1 | - |

Source: *Lara*

All shelters provide accommodation to women and children (girls and boys). *Žene sa Une* also accommodates men, making it a unique option in BiH. Children constitute a prevailing share of residents, especially in cases of begging, early marriage or sexual exploitation. Foreign victims remain few, though labor exploitation cases have recently increased.

**Table 8. Victims in *Žene BiH* Shelter, 2022–2024**

| | 2024 | 2023 | 2022 |
|---|---|---|---|
| **Total** | **3** | **1** | **2** |
| Female | 1 | 1 | 2 |
| Male | 2 | - | - |
| **By age** | | | |
| Adults | 1 | - | 1 |
| Children | 2 | 1 | 1 |
| **By nationality** | | | |
| Domestic | 2 | 1 | 2 |
| Foreign | 1 | - | - |

Source: *Žene BiH*

Admission is referral-based (by prosecutors, police, or social welfare centers) and consent-based for adults. For children, social welfare center is the authority to make the decision on accommodation, although the child's consent is also required for admission. Individuals with severe psychiatric conditions or active addictions are usually not admitted due to lack of clinical capacity. However, the lack of appropriate accommodation sometimes forces shelters to admit this category of VoTs, placing a significant strain on their already overstretched.

**Table 9. Victims in *Budućnost* Shelter, 2022–2024**

| | 2024 | 2023 | 2022 |
|---|---|---|---|
| **Total** | **12** | **4** | **10** |
| Female | 4 | 1 | 2 |
| Male | 8 | 3 | 8 |
| **By age** | | | |
| Adults | 4 | 1 | 2 |
| Children | 8 | 3 | 8 |
| **By nationality** | | | |
| Domestic | 10 | 4 | 10 |
| Foreign | 2 | - | - |

Source: *Budućnost*

All shelters operate as closed or semi-closed facilities, with 24/7 staffing, surveillance, and controlled access. Confidential locations are maintained, though not always fully secret. Staff accompany residents to schools, health institutions or court hearings, sometimes, when risk assessment implies so, with police escorts.

**Table 10. Victims in *Žene sa Une* Shelter, 2022–2024**

| | 2024 | 2023 | 2022 |
|---|---|---|---|
| **Total** | **15** | **14** | **12** |

| | | | |
|---|---|---|---|
| **By age** | | | |
| Adults | 2 | - | 1 |
| Children | 13 | 14 | 11 |
| **By nationality** | | | |
| Domestic | 8 | 13 | 10 |
| Foreign | 7 | 1 | 2 |

Source: *Žene sa Une*

Staffing follows minimum standards (psychologist, social worker, lawyer, support staff), but organizations struggle to maintain adequate coverage because salaries are tied to project funding and retroactive reimbursements. All reported heavy workload, fatigue, and reliance on short-term contracts, though professional supervision is in place.

**Funding**

Funding for shelters for VoTs in BiH is precarious and depends almost entirely on annual grants from the Ministry of Security. Protocols are often signed late in the year, leaving shelters to finance services for months at their own expense. Payments are always retroactive, and the daily accommodation rate varies annually, creating major uncertainty. The reason for this is traditionally late adoption of the state budget, as the allocations for shelters depend on it. Also, the daily accommodation rate is not set in advance, but is calculated by dividing the allocated sum with the number of days of accommodation at the level of all shelters. The rate increased significantly in 2024, but is still insufficient to cover all the needs.

In 2022, seven NGOs signed protocols, but in 2023 only four were accepted, as the Ministry argued that additional capacity was unnecessary due to declining numbers of identified victims. Only shelters with protocols receive reimbursement.

Unlike domestic violence shelters, where reimbursements are quarterly and predictable, services for VoTs are unstable. Shelters therefore rely on cross-subsidies, donor projects, or domestic violence funds. *Lara* has operated its shelter for VoTs without project funding since 2012, relying solely on state funding from different levels of government for victims of domestic violence and VoTs. *Budućnost* sustains staff salaries through donor solidarity, and *Žene BiH* runs at a deficit. All reported that if state funding ceased, services for VoTs would collapse.

The interviewees recommended that the state fix a clear per-day rate for accommodation, separate this from staff salaries and overheads, and ideally create permanent budget lines or multi-year agreements. At minimum, payments should be timely and predictable.

**Services at the Shelter**

Shelters provide comprehensive services, though scope and quality vary. Core elements include safe accommodation, food, medical care, psychological support, legal aid, social counselling, vocational training, reintegration assistance, and for foreign victims, support with repatriation.

Medical care is uneven: *Lara* has agreements with local health centers, *Žene BiH* relies on private clinics, while *Budućnost* must pay costs directly. Psychological assistance is provided through in-house staff or external therapists. Legal aid is fragmented: Lara has legal specialists both at the office and in the shelter who can provide legal aid to adults in the form of counselling and help with writing submissions and applications, but not representation in court. Other shelters rely on pro-bono lawyers, including free-legal aid *Vaša prava* association. Access to legal aid is not conditional on cooperation with law enforcement.

Children receive guardianship through social welfare centers, which coordinate with shelters on education and healthcare. Schools are engaged to ensure continuity, though reintegration into education for children in street situations is difficult. Beneficiaries who are irregular migrants are assisted similarly, though language barriers and reluctance to stay complicate support.

The interviewees stressed that economic empowerment and long-term education are the weakest areas, with very few systemic reintegration programs.

**Safety and Duration of Stay**

All shelters apply strict safety measures: surveillance, barred windows, controlled entry, and cooperation with police. Risk assessments are inconsistently conducted by authorities, and shelters often perform their own. No major breaches were reported in 2022–2024, though residents frequently express fear of perpetrators or of being returned to unsafe families.

Duration of stay is flexible. In *Budućnost*, rules foresee six months to a year but victims remain longer if needed. In *Žene BiH*, stays average two months; adults may leave earlier with waivers, while children's stays depend on social welfare centers. *Lara* reported an average of six months, but one girl stayed nearly four years to complete schooling. *Žene sa Une* reported some of the longest stays, exceeding 1,000 days in 2024. Exits occur when conditions are deemed safe, at the victim's request, or in cases of rule violations. As for children, after leaving the shelter, they either return to their families or are relocated to another social welfare residential facility.

**Reintegration**

Reintegration is the weakest element of BiH's support system. Shelters provide some reintegration during accommodation, but systematic aftercare is missing.

*Budućnost* is the only organization which reported structured follow-up, visiting former residents within 15 days and supporting employment through agriculture or links with factories. *Lara* maintains contacts with beneficiaries, encouraging them to reach out, while shelter staff occasionally calls former beneficiaries to check on their wellbeing. During their stay, staff and beneficiaries jointly develop an exit strategy, tailored to the beneficiaries' age and preferences, as part of the Safe House work plan. Lara also provides job-seeking support and has built a network of employers who may hire beneficiaries. However, this type of support is offered primarily to victims of domestic violence, since most VoTs accommodated

in *Lara's* shelter are children under 12. *Žene BiH* and *Žene sa Une* reported providing limited or no structured aftercare.

Needs identified include housing, education for children, employment for adults, and sustained psychological support. Many beneficiaries leave with limited skills, while foreign VoTs rarely stay in the country. Social welfare centers should play a central role, but are overstretched and lack specialization.

While recognizing the continued necessity of shelters, the interviewees stressed that they should be complemented by stronger community-based support, long-term housing, and reintegration programs to avoid a cycle of temporary protection without sustainable outcomes.

**Recommendations by interviewees**

Interviewees highlighted following priority areas:

- **Licensing and standards**: Adoption of a formal licensing system for shelters and mandatory, certified training for staff, with re-licensing and continuous education.
- **Financing**: Predictable, adequate funding through permanent budget lines or multi-year agreements, ensuring staff salaries and operational costs are covered, rather than relying on retroactive reimbursements.
- **Specialized support**: Stronger involvement of social welfare centers, development of long-term solutions for children (including foster care and specialized facilities), and tailored services for complex cases (psychiatric, addiction, disability).

## Montenegro

Montenegro is a country of origin, transit and destination for trafficked women, children, and men. Traffickers exploit both domestic and foreign victims in Montenegro, while victims from Montenegro are also exploited abroad. Perpetrators are predominantly men, often members of organized criminal groups operating across the Western Balkans. Women and girls from Montenegro and neighboring countries, as well as from parts of Eastern Europe, have been exploited in sex trafficking, frequently in the hospitality sector (bars, restaurants, nightclubs and cafés). Children, particularly Roma, are exploited in forced begging, and Roma girls from Montenegro have reportedly been sold into marriages and forced into domestic servitude in Montenegro and, to a lesser extent, in Albania, Germany and Kosovo. In the U.S. Department of State's 2025 Trafficking in Persons Report, Montenegro was classified as Tier 2

**Identification and referral**

The Team for the Formal Identification of Victims of Trafficking, established by government in 2019, is responsible for formal identification of VoTs. The Team consists of three permanent members: a

psychologist from the Institute for Social and Child Protection, a representative of the police, and a social worker from the social welfare center. Since September 2020, an NGO representative with a background in psychology has served as a permanent member. Team members are available 24/7 and, when needed, conduct field work.

Formal identification is not tied to the prosecution of traffickers. Potential/presumed victims have access to assistance and support. Once there is a suspicion of THB, the social welfare center is notified in parallel with the Team so that emergency protection, including shelter placement, can be arranged immediately.

Identification remains a consistent weakness, as reflected in the small number of formally recognized VoTs. NGOs indicate that some cases referred to the police, including those involving sexual exploitation, were not investigated, and the individuals concerned were not identified as VoTs. At the same time, cooperation in providing urgent protection has improved, and placement in a shelter no longer depends on the final formal decision.

**Table 11. Victims of Trafficking in Montenegro, 2019–2024**

| | | 2024 | 2023 | 2019-2022 |
|---|---|---|---|---|
| **Total** | | **24** | **11** | **73** |
| | Female | 12 | 7 | 39 |
| | Male | 16 | 4 | 34 |
| **Adults** | | **5** | **1** | **46** |
| | Female | - | 1 | 19 |
| | Male | 5 | - | 27 |
| **Children** | | **19** | **10** | **27** |
| | Female | 12 | 6 | 20 |
| | Male | 11 | 4 | 7 |

Source: Team for the Formal Identification of Victims of Trafficking

**Legal and policy framework**

The SOPs for the Identification of Victims of Trafficking in Human Beings were adopted in 2019. They envisage that formal identification is carried out by a multidisciplinary team and that the process is not linked to the initiation of criminal proceedings. The SOPs set out in detail the responsibilities of the

identification team, the steps to be followed, and the procedures for referral and support. Although not legally binding, it is the central document governing identification in practice and provides the framework within which institutions and NGOs operate. The SOPs for the treatment of unaccompanied or separated children, with special emphasis on proactive identification of potential/presumed and actual VoTs in this category, were adopted in 2017.

The Strategy for Combating Trafficking in Human Beings 2019–2024 contains measures to improve the quality of protection and assistance to victims, including through continued financing of shelters in line with the Law on Social and Child Protection and by contributing to the financing of licensed shelters for VoTs. The Strategy also contains a list of indicators for the early recognition of victims.

**Licensing and standards**

The licensing system and minimum standards for shelters and other social welfare services were introduced by the 2013 Law on Social and Child Protection, which also established the system for the licensing of professionals. The licensing process is further detailed in by-laws, including the Rulebook on the Closer Conditions for the Provision and Use, Norms and Minimum Standards of the Accommodation Service in Reception Centers and Shelters.

The Rulebook specifies space and staffing conditions, safety and quality requirements, and obliges providers to conduct at least annual quality evaluations that include beneficiary feedback. For shelters with capacity up to 20 users, daytime staffing for adults requires at least two professionals on core professional tasks and three associates, that is, one associate in night shift, licensed under the Rulebook on Closer Conditions, Criteria and the Procedure for Issuing, Renewing, Suspending and Revoking Licenses for Professional Workers in Social and Child Protection. Licenses may be granted on a full six-year basis or as a restricted three-year license where certain standards are not yet fulfilled and a deadline is given for compliance.

NGOs report the licensing process is bureaucratic and expensive. Some consider the criteria strict in ways that do not always reflect specialization or practices sensitive to the different needs of women, men, boys, and girls, and they criticize a market-style competition in which specialized women's organizations have been placed alongside non-specialized providers. Providers also point to rigid inspections focused on paperwork rather than service quality, down to formalities, while substantive improvements are not recognized if not explicitly prescribed. Staff licensing presents a structural bottleneck due to the limited pool of licensed professionals and high turnover towards more stable public-sector jobs. The authorities, for their part, view licensing as an essential quality control mechanism that clarifies who is in the social protection system and supports oversight.

The past decade saw significant turbulence in shelter provision linked to licensing. The Montenegrin Women's Lobby previously ran the only specialized trafficking shelter, at that time under the Ministry of the interior. This shelter was closed in March 2019 when it did not obtain a license under the new regime. A subsequent provider, the Institute for Social and Educational Policy, was licensed but later became embroiled in controversy, exposing a systemic flaw: the rulebook on issuing, renewing, suspending and revoking licenses did not require criminal-record checks for founders or managers. This gap allowed an

individual with final convictions for violent offences to lead a licensed provider supported from the state budget, and prompted broader criticism of the model.

**Shelters**

At present there is one licensed NGO shelter for adult women and one state facility for children.

The NGO SOS Hotline for Women and Children Victims of Violence Nikšić operates an open-type shelter for adult women, licensed for three years in January 2024 with capacity to accommodate three beneficiaries. This long-standing women's organization, founded in the late 1990s, has a long tradition of providing specialized support and admitted VoTs even before accreditation, often through its shelter for women victims of domestic violence. In fact, the number of VoTs accommodated was higher before licensing, including foreign victims and minors, than in the period after licensing. In 2024 there were no residents placed in the shelter as not a single adult female VoT was identified. The facility is owned by the organization and operates at an unlisted address; however, in a small community it is difficult to maintain full confidentiality of its location. Stays of up to twelve months are possible with a strong reintegration component, but minors cannot be admitted. Staffing meets the licensing requirements, although recruitment and retention remain difficult given the shortage of licensed professionals.

For children, a temporary state shelter was opened in April 2024 within the *Ljubović* complex in Podgorica with capacity for ten beneficiaries. Given Montenegro's small communities and the sensitivity of cases, notably within Roma settlements, placement in foster families is at times assessed as unsafe, and shelter placement, at least initially, proved more appropriate. The location of the state shelter on a site that also houses a center for juveniles in conflict with the law has been criticized by NGOs and international actors.

No shelter accommodates male VoTs or female VoTs accompanied by children.

Available sheltering capacity is insufficient for group cases. For example, an organized criminal group dismantled in 2022 involved nearly twenty women, and the existing facilities were stretched beyond their limits. Centralization in Podgorica and Nikšić complicates access for VoTs from the north or the coast, including schooling for children relocated from other regions.

**Funding**

Shelters for VoTs are state-funded. The state announces an annual call at the beginning of the year. The SOS Hotline for Women and Children Victims of Violence Nikšić applies and, as the sole licensed provider for adult women, has received earmarked support so far—EUR 50,000 for 2024 and EUR 60,000 for 2025, irrespective of occupancy. In addition, for each individual placed, the competent social welfare center pays EUR 350 per month on the basis of an individual placement decision.

SOS Hotline for Women and Children Victims of Violence Nikšić stressed that the costs of preparing for licensing were substantial and had to be borne by the organization itself. The premises were renovated and equipment provided with donor support. Obtaining the license subsequently unlocked access to state funding.

The state shelter for children is a social welfare institution funded from the state budget in the same way as other social welfare institutions.

The funding model is more predictable than *ad hoc* grants but remains fragile. It reinforces competitive dynamics with non-specialized providers.

**Services at the shelter**

An individual work plan is developed with each beneficiary, aligned with the social welfare center's plan or the service-use agreement. In addition to food, clothing, and safe accommodation, SOS Hotline for Women and Children Victims of Violence Nikšić provides psychological counselling and psychotherapy (including in Ukrainian and Russian), accompaniment by a trusted person, emotional support, legal assistance and representation through lawyers, safe transport and structured occupational activities. Cooperation with specialized NGOs includes services for women with substance-use disorders, while the shelter runs a weekly counselling program in this area. Medical services are accessed through the public health system.

For children, services are provided under child protection rules through the state facility and the social welfare centers, although very high caseloads at the social welfare centers of up to 120 families per caseworker constrain meaningful follow-up.

**Safety and duration of stay**

Shelter licensing requires providers to adopt comprehensive internal procedures covering, *inter alia*, risk assessment, emergency intervention and safety protocols. Risk assessment in criminal justice terms is primarily performed by the police, while providers carry out service-related safety assessments at admission and throughout placement. SOS Hotline for Women and Children Victims of Violence Nikšić ensures physical security through perimeter fencing, alarms and video surveillance; the police station is nearby and responds promptly when called. The shelter is still relatively new and the number of residents has been modest, so longitudinal evidence on security incidents is limited.

The theoretical maximum duration of stay at SOS Hotline for Women and Children Victims of Violence Nikšić is twelve months. Actual duration depends on individual needs, judicial processes and reintegration prospects. For children, the social welfare center determines placement length and exit pathways.

**Reintegration**

Reintegration is considered the weakest segment of the system. Shelters address immediate needs and, in the NGO model, work towards education, employability and psychosocial stabilization. However, long-term reintegration services are not licensed, there is little structured aftercare support, and capacity for follow-up of the social welfare centers is thin. In practice, VoTs often face serious barriers in housing and employment and, in some cases, return to the environments associated with exploitation risks. The need

for sustained reintegration, including trauma-informed psychotherapy and longer-term case management, remains largely unmet.

**Recommendations by interviewees**

Interviewees identified several priority areas:

- **Identification:** Strengthen proactive identification at the local level, improve the screening of migrants and vulnerable groups, ensure consistent application of indicators, and address the persistent under-identification of victims.
- **Licensing and standards:** Revise the licensing framework to include criminal-record checks, embed specialization and criteria that are sensitive to the differing needs of women, men, girls, and boys, and avoid competition with non-specialized organizations that undermines experienced women's NGOs.
- **Services:** Expand specialized services for men and boys, improve deficiencies related to the accommodation for children, and strengthen mental-health and addiction support for all categories of victims.
- **Reintegration:** Develop long-term reintegration services, including housing, vocational training, employment opportunities and sustained psychological support, with particular attention to children, male victims and those with complex needs.

## North Macedonia

North Macedonia is a country of origin, transit, and destination for THB. Victims are exploited for sexual exploitation, forced marriages, forced begging, and, to a lesser extent, labor exploitation and organ removal. The majority of identified victims are domestic, primarily children, while a smaller number of foreign victims are detected. Women and girls are particularly vulnerable to sexual exploitation, while Roma children are often subjected to forced begging and coerced into early or forced marriages. Men and boys are exploited to a lesser extent, mainly for labor. North Macedonian citizens are also trafficked abroad, primarily to Southern, Central, and Western Europe, for sexual and labor exploitation. Migrants and refugees transiting the country, especially women and unaccompanied minors, remain at high risk of exploitation. In the latest U.S. Department of State's 2025 Trafficking in Persons Report, North Macedonia was classified as Tier 2.

**Identification and Referral**

The identification and referral of VoTs in North Macedonia is regulated by the NRM, coordinated by the Ministry of Social Policy, Demography and Youth (until June 2024, Ministry of Labor and Social Policy). First responders, such as police officers, social workers, or NGOs, may detect potential/presumed victims and are obliged to refer them to the anti-trafficking unit and the NRM for assessment. Official identification is made of the Operational Team, established in 2021 under the National Commission for

Combating Trafficking in Human Beings and Illegal Migration. The Team includes a prosecutor, a police officer, a social worker, and an NGO representative.

Mobile Teams, introduced in 2018, have been recognized as a good practice for proactive identification. They consist of police, social workers, and NGO professionals, and operate in several cities. Despite resource constraints, they remain one of the most effective tools in detecting vulnerable individuals. However, their work is hampered by insufficient resources and, in some cases, the absence of Ministry of Interior staff. Despite these obstacles, the multi-sectoral approach is seen as a good practice.

Both potential/presumed and identified VoTs have equal access to support and protection. The system functions in theory; however, in practice, identification often lags, referrals are inconsistent, and many children remain outside established protection frameworks.

**Table 12. Victims of Trafficking in North Macedonia, 2022–2024**

| | 2024 | 2023 | 2022 |
|---|---|---|---|
| **Formally identified victims** | **40** | **7** | **9** |
| **By sex** | | | |
| Female | 38 | 5 | 8 |
| Male | 2 | 2 | 1 |
| **By age** | | | |
| Adults | 38 | 1 | 2 |
| Children | 2 | 6 | 7 |
| **By nationality** | | | |
| National | 2 | 7 | 7 |
| Foreign | 38 | - | 2 |
| **By type of exploitation** | | | |
| Sexual | 37 | 5 | 2 |
| Forced marriages | 1 | - | 6 |
| Begging | - | 2 | - |

| | | | |
|---|---|---|---|
| Labor | 2 | 1 | - |
| Organ removal | - | - | 1 |
| **Potential/presumed victims** | **8** | **9** | **13** |
| **By sex** | | | |
| Female | 6 | 8 | 10 |
| Male | 2 | 1 | 3 |
| **By age** | | | |
| Adults | 1 | - | 5 |
| Children | 7 | 9 | 8 |

Source: Annual report of the National Commission for Combating Trafficking in Human Beings and Illegal Migrations

Between 2022 and 2024, sexual exploitation, forced marriage, and forced begging were the most common forms of THB. At the same time, a mobile teams recorded a higher number of potential/presumed victims, especially among children, including migrants. However, the interviewees consistently emphasized that the actual number of trafficked persons is likely higher, as many cases remain undetected or are misclassified as neglect, domestic violence, or other offences.

**Legal and Policy Framework**

The SOPs for Treatment of Victims of Human Trafficking were first adopted in 2008 and have been regularly updated, most recently in 2023. They regulate, *inter alia*, procedures for coordinated assistance and support, and for re-socialization and reintegration, including cooperation of all competent institutions and NGOs. Specialized SOPs have been developed for unaccompanied minors, migrants at risk, and other vulnerable groups.

Assistance and support for VoTs in North Macedonia is regulated through the Law on Social Protection and detailed Rulebooks adopted by the Ministry of Labor and Social Policy.

Programs for the Reintegration of Adult and Child Victims of Trafficking were developed in 2014, envisaging individualized support plans including accommodation, medical and legal protection, education, and social and economic assistance. These remain in force but are not fully harmonized with later legal changes. The Program for Assistance and Support in Reintegration of Victims of Human Trafficking and the Program for Assistance and Support in Reintegration of Child Victims outline entitlements in more detail, but the interviewees underline that implementation is uneven and resources insufficient.

The 2021–2025 National Strategy and Action Plan for Combating Human Trafficking and Illegal Migration, alongside the Operational Plan for the Fight against Child Trafficking, provide the overarching framework, with identification and referral, direct assistance, and reintegration being among strategic priorities.

Cooperation with civil society is seen as one of the main principles of the Strategy and NGOs are seen as genuine partners. The Strategy foresees, among other things, the enhancement of accommodation services for both domestic and foreign VoTs.

Despite a relatively comprehensive legal and policy framework, gaps persist in practice. While SOPs are generally assessed as clear and workable, their consistent application across institutions is lacking.

**Licensing and Standards**

North Macedonia has only one shelter for VoTs. In 2021, the Ministry of Labor and Social Policy introduced a Rulebook on the Manner, Scope, Norms and Standards for the Provision of Social Services in Temporary Residence. This Rulebook sets out requirements on space, staffing, and documentation, and applies to centers providing temporary accommodation for VoTs. It defines beneficiaries broadly, including children without parental care, children in street situations, victims of domestic violence and violence against women and girls, and VoTs. The Rulebook establishes rights to accommodation, food, clothing, medical care, psychosocial and legal support, and reintegration services. It also prescribes minimum conditions such as room size, maximum number of beds, natural light, and separation of children from adults. The license is renewed every five years.

In addition to meeting all accommodation and service standards, the shelter must employ at least two permanently engaged licensed professionals. Staff licensing is regulated by the Rulebook on the Manner of Issuing, Extending, Renewing and Revoking the Work License of Professional Workers, which also defines the form and content of the work license.

However, licensing does not guarantee state funding, and the sustainability of the service continues to depend on external resources. Quality control is formally ensured through state inspections, but these are infrequent. Internal supervision mechanisms are in place, yet available resources remain limited.

**Shelters**

North Macedonia has only one specialized shelter for VoTs. Initially established by NGO Open Gate/La Strada in 2005, in 2011 the shelter was transformed into a government shelter, the Centre for Victims of Trafficking in Human Beings, managed by NGO Open Gate/La Strada. The shelter is located in Skopje and provides temporary accommodation for women and girls over the age of 12, both nationals and foreign citizens with residence permits. Foreign victims without permits are excluded from this service and are instead placed in the Reception Centre for Foreigners, a closed facility run by the Ministry of Interior, primarily used for detention prior to deportation. This practice has been criticized by civil society and international organizations as contrary to the principles of victim protection. There is no shelter for male victims.

Although formally registered for 10, due to spatial limitation of premises, the Centre for Victims of Trafficking in Human Beings has six available beds, which is insufficient given the increasing number of identified and potential/presumed victims. When beds are unavailable, alternative solutions are sought

through foster families, small group homes, or *ad hoc* arrangements supported by donors. However, these solutions are temporary and lack specialization in trafficking cases.

**Table 13. Victims in Open Gate's-managed shelter, 2022–2024**

| | 2024 | 2023 | 2022 |
|---|---|---|---|
| **Total** | **10** | **11** | **9** |
| Adults/women | 3 | - | - |
| Children/girls | 7 | 11 | 9 |
| **Newly referred** | **4** | **6** | **6** |
| **By nationality** | | | |
| Domestic | 7 | 10 | 8 |
| Foreign | 3 | 1 | 1 |
| **By status** | | | |
| Identified victims | 2 | 4 | 7 |
| Potential/presumed victims | 8 | 7 | 2 |

Source: Annual report of the National Commission for Combating Trafficking in Human Beings and Illegal Migrations

The shelter is officially categorized as mixed, emergency and reintegration, though its role has extended far beyond temporary accommodation. The admission is consent-based.

The shelter employs a multidisciplinary team, including social workers, psychologists, educators, and a coordinator. Staff levels are higher than the legal minimum, as it is impossible to run this sort of service with only two staff members, but financial insecurity hampers recruitment and retention.

**Funding**

Although the shelter is licensed, state funding remains partial and unpredictable. The Ministry of Social Policy, Demography and Youth covers the cost of utilities and allocates approximately EUR 700 per month per accommodated beneficiary. This funding is insufficient to cover 24/7 staffing, food, healthcare, and reintegration activities. For years (2011–2021), government contributions covered only rent and utilities, forcing Open Gate to rely heavily on donor projects.

Since 2022, the Ministry has contracted Open Gate as a licensed provider, but financing remains tied to the number of beneficiaries, creating instability. Donor contributions are indispensable for vocational training, psychotherapy, clothing, and other essential services. Open Gate has repeatedly advocated for a sustainable funding model, emphasizing that the shelter provides services more cost-efficiently than comparable facilities, yet remains underfunded.

**Services at the Shelter**

Open Gate provides comprehensive services at its shelter in line with the SOPs and international standards. These include safe accommodation, food, clothing, psychosocial support, medical examinations, legal aid, educational support, vocational training, and assistance with employment opportunities for older beneficiaries. VoTs also benefit from cultural and social activities, such as attending cinema, theatre, and recreational outings.

Medical services are provided in cooperation with public health institutions, although access is often slow. Psychotherapy is usually available only through private practitioners. Legal assistance is offered through long-standing cooperation with specialized lawyers, while education and skills training are organized both formally and informally. Work with families is considered crucial for reintegration, and outreach services also extend to victims placed in alternative accommodation.

Specialized long-term services beyond temporary accommodation remain unavailable

Specialized services for male VoTs and for individuals with severe mental health conditions or disabilities are lacking. Interviewees reported difficulties in accommodating children with aggressive behavior or complex needs, as no other specialized facilities exist. This places additional strain on the shelter team and highlights systemic gaps.

**Safety and Duration of Stay**

Safety assessments are carried out jointly by the Ministry of Interior, social workers, and Open Gate staff. The shelter operates on a secret location. Depending on the risk assessment, the regime may be closed or open, allowing beneficiaries to attend school or social activities.

According to legal provisions, accommodation should last between six months and one year. In practice, due to systemic gaps, children often remain until they turn eighteen, far exceeding the intended timeframe. This long-term stay underscores the lack of specialized facilities and reintegration options. Adults usually leave earlier, but their reintegration into society is not systematically supported.

**Reintegration**

Reintegration of VoTs into society remains one of the weakest aspects of North Macedonia's system. While SOPs and programs foresee individual reintegration plans, implementation is limited. VoTs receive some support while in the shelter, including education, skills training, and family counselling. After

beneficiaries leave, Open Gate maintains contact by offering follow-up support at home, assisting with the continuation of medical treatment, supporting school attendance, helping with job searches and application processes, and other needs as they arise.

However, sustainable reintegration is hindered by the lack of dedicated services and programs. Active labor market measures exist but are rarely used, as the Employment Agency does not guarantee data protection, deterring victims from applying. Financial support under the Law on Social Protection is minimal, irregular, and insufficient. The absence of transitional housing, halfway houses, or long-term counselling means that many victims risk social exclusion or re-victimization after leaving the shelter.

**Recommendations by interviewees**

Interviewees identified several priority areas:

• **Sheltering:** Establish additional emergency accommodation for all categories of VoTs (women, men, and children; domestic and foreign), expand the capacity of the existing shelter, and ensure separate units for minors, as well as alternatives such as halfway houses and transitional housing.

• **Financing:** Secure predictable and sufficient state financing that covers full operational and reintegration costs of shelters and services, introduce multi-year agreements, and reduce dependence on *ad hoc* donor funding.

• **Services:** Improve access to specialized medical and psychological care, expand services for VoTs with complex needs (including children, men, and persons with disabilities), and provide regular supervision and psychological support to professionals.

• **Reintegration:** Strengthen long-term reintegration programs, including education, vocational training, employment, and community support, and ensure protection of personal data in employment measures to encourage victim participation.

## Serbia

Serbia is a source, transit, and destination country for THB, affecting women, men, and children. Victims are subjected to sexual exploitation, forced labor, forced begging, forced marriages, and coercion into criminal activity. THB does not affect a single profile of persons but disproportionately targets the most marginalized and socially excluded. The majority of identified VoTs are Serbian nationals and cases of internal THB, yet the number of foreign VoTs has increased in recent years. Children account for around half of all cases identified nearly every year. Labor migration and exploitation of foreign workers emerged as new trends, adding to the complexity of the trafficking landscape. In the U.S. Department of State's 2025 Trafficking in Persons Report, Serbia was classified as Tier 2.

**Identification and Referral**

The key institution in the NRM is the Centre for Trafficking Victims' Protection (Center), established in 2012 by government decision as a specialized social welfare institution. Through its Agency for Coordination of Assistance to Trafficking Victims (Agency), the Centre carries out the formal identification of VoTs and coordinates their protection. It acts on preliminary identification reports submitted by state institutions, primarily by the police and social welfare centers, as well as NGOs, international organizations, individuals, or victims themselves. In some cases, it initiates preliminary identification directly. The system of identification is based on social welfare criteria rather than criminal law, meaning that victim status can be granted without the prosecution or conviction of the perpetrators. This approach ensures unconditional access to protection and is considered a good practice. Both victims and potential/presumed victims have access to support services.

The Agency forms the core of the Centre's work. It identifies victims, provides immediate support at the time of identification, ensures the involvement of relevant service providers, and monitors the implementation and outcomes of protection measures. Since 2023, the Agency has been staffed by five licensed professionals and a manager.

The Rulebook on the Identification and Coordination of Protection, the Center's internal document introduced in December 2024, regulates the identification process. For adult victims, a needs assessment is conducted upon identification, based on which a protection plan is developed in collaboration with the VoT. For children, the Center has an advisory role, while the primary responsibility rests with social welfare centers.

**Table 14. Victims of Trafficking in Serbia, 2022–2024**

| | | 2024 | 2023 | 2022 |
|---|---|---|---|---|
| **Total** | | **71** | **66** | **62** |
| | Female | 49 | 47 | 49 |
| | Male | 22 | 19 | 13 |
| **By age** | | | | |
| | Adults | 36 | 25 | 37 |
| | Children | 35 | 41 | 25 |
| **By nationality** | | | | |
| | National | 55 | 60 | 56 |
| | Foreign | 16 | 6 | 6 |
| **Internal vs cross-border** | | | | |

| | | | |
|---|---|---|---|
| Internal THB | 50 | 52 | 48 |
| Cross-border THB | 21 | 14 | 15 |
| **By type of exploitation** | | | |
| Sexual | 24 | 13 | 34 |
| Forced begging | 13 | 17 | 8 |
| Labor | 16 | 11 | 4 |
| Forced marriage | 4 | 8 | 6 |
| Criminal activity | 8 | 7 | 2 |
| Economic | - | - | 1 |
| Illegal adoption | 2 | - | - |
| Participation in armed conflict | 1 | - | - |
| Multiple | 3 | 10 | 7 |

Source: Statistical Reports of the Center for Trafficking Victims' Protection

The protection plans are elaborated during case conferences that bring together relevant institutions, including the police, prosecution, NGO service providers, schools, and, where appropriate, families. When referring VoTs to service providers, the Centre does not impose decisions on them: the choice of services remains with the beneficiaries, while the Centre provides information, guidance, and coordination.

Several interviewees emphasize persistent shortcomings and under-identification. Victims of labor exploitation remain largely under-identified, particularly among the growing number of migrant workers employed through legal channels. Women from migrant communities who enter forced marriages and are subsequently subjected to forced labor are often viewed through the lens of cultural tradition rather than as VoTs. Victims among irregular migrants and asylum seekers are rarely identified, despite clear indications of widespread exploitation. Many remain outside the system, as they move quickly through Serbia, lack documentation, and avoid contact with institutions.

**Legal and Policy Framework**

The SOPs for Treatment of Victims of Human Trafficking were adopted by the government Anti-Trafficking Council in 2019, and it was planned to be revised once a year. Although two revision attempts have been made so far, the SOPs have never been updated and are inconsistently applied in practice. They were designed to guide all state and non-state actors in identification, referral, protection, criminal

proceedings, compensation, and voluntary return. The provision of safe accommodation is mentioned only briefly in the chapter on urgent support. However, the lack of implementation and the outdated content limit their effectiveness.

The Program for Combating Trafficking in Human Beings 2024–2029 and its accompanying action plan identify the improvement of protection for potential/presumed and identified victims as a specific objective, with particular attention to women and children. The measures envisage the establishment of a shelter for men, the provision of psychological and legal support, economic empowerment, and thr strengthening the Centre's capacities.

The Centre operates in accordance with its Rulebook on Identification and Coordination of Victim Protection, as well as other internal documents, including indicators for identifying VoTs differentiated by age and type of exploitation. Specialized indicators exist for various systems, including education, social welfare, and healthcare. Their use, however, is optional and depends on the willingness of responsible institutions to adopt and apply them. Comprehensive minimum standards for the provision of victim support have not been established; only structural and functional standards related to the licensing of two specialized services are in place.

Many of the gaps in the legal and policy framework are expected to be addressed through the draft Law on the Prevention and Suppression of Trafficking in Human Beings and Protection of Victims. The draft law places strong emphasis on victims' rights, ensuring access to information, legal assistance, healthcare, and safe accommodation. It confirms the Centre's central role in identification and envisages the establishment of an appeal commission composed of representatives of the Ministry, police, and other institutions.

**Licensing and Standards**

The Law on Social Protection recognizes VoTs as a specific category of service beneficiaries. The Rulebook on Standards and Conditions for the Provision of Social Protection Services regulates several types of services, including accommodation for VoTs as a specialized form of support. Licensing falls under the responsibility of the Ministry of Labor, Employment, Veterans and Social Affairs.

To obtain a license, service providers are obliged, among other conditions, to employ a prescribed minimum number of licensed professional staff in accordance with the Rulebook on the Licensing of Professional Workers in Social Protection. In practice, this means that key positions (typically social workers, psychologists, and other relevant profiles) must hold individual professional licenses, and providers must maintain that staffing baseline for the duration of the service license.

In 2018, NGO *Atina* became the first organization to obtain a license for an assisted housing service for VoTs. The license is granted for the period of six years. Since then, renewal procedures have become increasingly complex and costly, requiring extensive documentation, inspections, and the engagement of additional staff. While licensing has enhanced *Atina*'s visibility and formal recognition within the system, it has also created significant administrative and financial burdens.

The state-run Shelter for Victims of Trafficking, operated by the Centre, obtained its license in 2022. Even as a state institution, the licensing process was described as demanding, forcing the Center to temporarily shut down the shelter to meet all structural requirements.

NGO ASTRA's SOS Hotline for victims of trafficking, licensed in 2018 under the standards for a helpline service for women with the experience of violence, has faced a challenging renewal procedure. Despite repeatedly submitting the required documentation, new requests for additional or updated documents were made, often only verbally. The process has lasted for more than a year and a half.

Quality control is exercised primarily through regular reporting to the line ministry on the services provided. Inspections are possible but rarely conducted in practice. Service providers apply their own internal quality measures. For example, *Atina* conducts annual evaluations and beneficiary interviews, and maintains complaint and feedback channels for management to address.

All of these illustrate a significant gap between regulatory requirements and actual practice. While shortcomings in state institutions are often tolerated, NGOs face strict scrutiny even though they receive no state funding for their services. Although licensing is formally aimed at improving service quality, in practice it often discourages NGOs by depleting their resources without providing institutional stability.

**Shelters**

There are two specialized shelters for VoTs in Serbia: the state-run Shelter for Victims of Trafficking, which provides urgent accommodation, and NGO *Atina*'s assisted housing service. A memorandum of cooperation between the two ensures that victims can be referred from the urgent shelter to *Atina*`s longer-term accommodation once they have stabilized.

Accommodation in the shelters is always based on victim's consent. It is never imposed against their wishes, even when such placement is assessed to be in their best interest.

The state Shelter for Victims of Trafficking, operated by the Centre, was established in 2019 and has six places for women and girls over the age of 16, including their children. It is a closed facility with enhanced security measures, and staff are present at all times. The shelter employs nine staff members, including psychologists, social workers, and pedagogues. VoTs are admitted only through referral by the Centre. No victim has been refused so far, although many have complex psychiatric needs that stretch the shelter's capacities. Since its opening, the Shelter has had to close twice for specific periods due to structural reasons, during which beneficiaries were referred to other accommodation facilities, primarily to NGO *Atina*.

**Table 15. Victims in the state-run Shelter, 2022–2024**

| | 2024 | 2023 | 2022 |
|---|---|---|---|
| Total | 16 | 14 | 8 |

| | | | |
|---|---|---|---|
| **By age** | | | |
| Adults | 8 | 9 | 3 |
| Children | 8 | 5 | 5 |
| **By nationality** | | | |
| Domestic | 14 | 13 | 5 |
| Foreign | **2** | **1** | **3** |
| **By type of exploitation** | | | |
| Sexual | 3 | 8 | 3 |
| Forced marriage | 3 | 1 | - |
| Criminal activity | - | 1 | '- |
| Forced begging | 2 | 1 | 1 |
| Multiple | 2 | 2 | 1 |
| **Potential/presumed victim** | **6** | **1** | **3** |

Source: Statistical Reports of the Center for Trafficking Victims' Protection

NGO *Atina*'s Assisted Housing Service, established in 2003, was licensed in 2018 for six beneficiaries. It is an open service intended for women and girls over the age of 15, including both potential/presumed and identified victims. The facility has also been used for urgent accommodation when necessary. Residents have freedom of movement and are supported in developing independence and skills for everyday life. Victims requiring 24/7 medical care or those with untreated substance dependence are not eligible for accommodation. NGO *Atina* employs three licensed professionals: a psychologist, a social worker, and a lawyer. In practice, seven staff members are engaged in the direct support program. An initial needs assessment is conducted upon admission, followed by a more detailed review after three months, which serves as the basis for an individual support plan.

**Table 16. Victims in *Atina*'s Shelter, 2022–2024**

| | 2024 | 2023 | 2022 |
|---|---|---|---|

| | | | |
|---|---|---|---|
| **Total** | **10** | **10** | **5** |
| **By age** | | | |
| Adults | 8 | 9 | 2 |
| Children | 2 | 1 | 3 |
| **By nationality** | | | |
| Domestic | 3 | 7 | 4 |
| Foreign | 7 | 3 | 1 |
| **Internal vs. cross-border** | | | |
| Internal THB | 3 | 6 | 4 |
| Cross-border THB | 7 | 4 | 1 |
| **By type of exploitation** | | | |
| Sexual | 5 | 8 | 2 |
| Labor | 4 | 1 | 2 |
| Forced marriage | - | - | 1 |
| Criminal activity | 1 | 1 | 1 |

Source: *Atina*

There is no specialized shelter for child VoTs in Serbia. Children are accommodated through social welfare centers, usually in homes for the upbringing of children or in foster families. There are no specialized foster families for trafficked children, and institutions are often reluctant to admit them. In 2023, several placement requests were rejected by multiple institutions. In recent years, the Centre has also registered cases of children being recruited while living homes for the upbringing of children or in foster families.

There is likewise no shelter for male VoTs. When necessary, alternative accommodation options are used, which are not licensed, such as commercially rented flats, hostels, or residential social welfare institutions, all of which are funded by NGOs. The Centre recently obtained an apartment intended for male victims, but the service has not yet been operationalized or licensed.

**Funding**

Funding arrangements differ sharply between the two shelters. The state Shelter for Victims of Trafficking is financed from the state budget, like other social welfare institutions. *Atina*'s assisted housing service,

by contrast, has not received state funding for more than two decades and relies entirely on donor projects and its social enterprise.

Licensing of services is mandatory for NGO service providers. It imposes certain obligations and provides formal recognition but does not guarantee financing. Still, the Aurora information system of the Ministry of Labor, Employment, Veterans, and Social Affairs requires all licensed providers to report state funding. The system does not accept "0 RSD" entries, effectively excluding the possibility that a licensed service receives no budgetary support.

The Centre is primarily funded through the state budget, with additional donor support used to secure specialized services, such as psychotherapy or workshops.

The draft Law on the Prevention and Suppression of Trafficking in Human Beings and Protection of Victims envisages state financing for victim support services provided by NGOs. However, this applies only to licensed services, which represent just a small portion of what NGOs deliver and what VoTs actually need. At present, only two types of services for VoTs can be licensed, as minimum standards for licensing other services have not yet been established.

**Services at the Shelters**

Both shelters provide accommodation, psychosocial support, legal assistance, and daily living support.

The state-run shelter offers psychosocial support, crisis intervention, medical assistance, legal counseling, and opportunities for education and vocational training, often in cooperation with NGOs. Beneficiaries also participate in recreational and cultural activities through memoranda with local institutions, such as sports centers and theatres.

*Atina*'s program places strong emphasis on reintegration and social inclusion, offering educational support, vocational training, employment counselling, psychological and family counseling, mediation, and economic empowerment. It also assists beneficiaries in obtaining personal documents and regularizing their residence status, particularly for foreign victims.

Despite these efforts, specialized services remain insufficient. There is no shelter for men and no specialized services for children. Services outside Belgrade are scarce, leaving victims in other parts of the country without meaningful support. Reintegration programs are limited in both scope and scale. Since social welfare services are funded by local governments, while the number of VoTs is relatively small, especially considering their places of residence, local governments have little interest in developing or financing specialized services.

## Safety and Duration of Stay

Risk assessments are formally the responsibility of the police but are often not carried out in practice. *Atina* relies on informal cooperation to obtain information on potential risks. Beneficiaries report feeling safe within the shelter environment, despite ongoing fears connected to traffickers or court proceedings.

The state-run shelter is designed for urgent accommodation with a maximum stay of six months, which may be extended for an additional six months. In practice, stays are often longer when no alternative housing is available. Victims typically leave for family reintegration, independent housing, or referral to *Atina*'s service. For children, outcomes vary and may include placement in foster families or a maternal home.

Accommodation in *Atina*'s assisted housing service is formally limited to one year but can be extended in exceptional cases. The average stay between 2022 and 2024 was approximately eight months. Victims usually leave once they are ready for independent living, supported by family, friends, or social services.

**Reintegration**

Reintegration support remains weak throughout the system. *Atina* operates a Reintegration Center that provides daily support and outreach; however, the absence of local services severely limits the options available to victims outside Belgrade. Psychological counselling, legal aid, and economic empowerment programs are available almost exclusively through NGOs. Victims often do not know where to seek support after leaving shelters.

The Centre monitors cases as long as THB-related risks persist, after which victims are referred to other systems. The state-run shelter does not provide reintegration directly but seeks to help victims establish support networks. *Atina*, by contrast, maintains long-term contact with former beneficiaries, offering assistance for years as needed, depending on their individual needs and wishes.

**Recommendations by interviewees**

Interviewees identified three priority areas for improvement in Serbia:

- **Licensing and standards:** Licensing procedures should be simplified, transparent, and applied equally to state and non-state actors. Comprehensive minimum standards for victim support should be established, including specialized guidance for children, men, and foreign nationals.
- **Financing:** Predictable and adequate public funding should be secured for shelters and related services through permanent budget lines or multi-year agreements. Financing must cover staff salaries, operational costs, and specialized support, rather than leaving NGOs dependent on short-term donor projects.
- **Specialized support:** The scope of services needs to be expanded to address existing gaps, in particular accommodation and support for men, specialized care for children (including dedicated foster families and facilities), and reintegration programs accessible beyond Belgrade. The system must also respond to emerging trends, notably the exploitation of foreign workers, by ensuring residence regulation, legal assistance, and tailored support.

## Voices of Survivors

Over time, the fight against THB has shown that survivors must be more than mere beneficiaries of support: they need to be heard and involved. Their experiences shed light on realities that policies and institutions alone cannot fully grasp. When survivors are given space to speak, they bring honesty, clarity, and insights that make responses more humane and effective. Including them is not only a matter of respect, but also a way of ensuring that solutions reflect their real needs and challenges. With courage and generosity, 11 survivors from Albania, BiH, North Macedonia and Serbia shared their voices and perspectives for this mapping exercise. They spoke about their first contact with support services, how their needs were assessed, and the ways in which their safety was protected. They shared their experiences and level of satisfaction with shelters and other forms of assistance, reflected on their reintegration process, pointed out significant shortcomings in available services, and offered suggestions for improvement.

They commented on their first contact and access to the services they used, how the assessment of their needs was done, how their safety was protected, elaborated on their experience and satisfaction with the shelter and support services they received, their needs and experiences during reintegration, major flaws related to shelters and other services and thoughts for improvement.

**First Contact and Access to Services**

*"At first, I was scared and confused,*
*but when I saw how kind and respectful the staff were,*
*I started to feel safe.*
*That was the first moment I felt I wasn't alone anymore."*

For most survivors, the first contact with support services came through the police, social workers, or lawyers. In some cases, friends or even strangers helped them find their way to a shelter. While some had never heard of such services before, others were directed by professionals who immediately recognized the need for safe accommodation and protection.

The first moments of entering a shelter were often marked by fear, confusion, and uncertainty. Survivors described feeling anxious about what awaited them, unsure of the rules, or hesitant to trust new people after traumatic experiences. For some, the arrival felt like yet another closed space, resembling detention. Others felt relief and hope the moment they realized they were leaving unsafe environments behind. Almost all agreed that the attitude of the staff, who offered reassurance, respect, and patience, played a decisive role in transforming those first difficult days into the beginning of safety and recovery.

Rules and procedures were generally explained upon arrival, though not always remembered immediately. Many survivors said they were overwhelmed and unable to take everything in immediately, but later came to understand the rights, obligations, and daily routines. Some recalled being given written rules to sign, while others mentioned that staff repeated explanations whenever needed. For many, this straightforward guidance, together with staff availability and kindness, helped them settle and gradually feel at home.

Despite differences in detail, the survivors' stories share a common thread: the transition from fear and insecurity to relief and trust, made possible by the presence of dedicated professionals who took time to explain, support, and simply be there.

**Identifying Need and Shaping Support**

*"They didn't just ask, 'What do you need?'*
*-they stayed with me until I found the words,*
*and then helped make it happen."*

On arrival, most survivors were greeted by staff who introduced themselves, explained the service, and asked about immediate and longer-term needs. Many describe their first conversations as calm and practical: being offered food, clean clothes or a welcome pack; asked about health concerns; and told, step by step, what would happen next. Several noted that staff repeated information over time, recognizing that shock or exhaustion made it hard to absorb everything at once.

Across accounts, survivors felt their situation and wishes were taken seriously. Staff asked what they needed "now" (safety, rest, medicine, a trusted person to call) and what they wanted "next" (schooling, training, documents, therapy, family contact). Where possible, preferences were accommodated: one survivor said she was supported to cook familiar food the first day; another was helped to restart physiotherapy after it had been denied elsewhere; others were accompanied to doctors, supported to obtain IDs and health insurance, or enrolled in school and skills training. Staff availability—day or night—was frequently mentioned as a source of reassurance.

*"At first, I was overwhelmed, but they explained every step,*
*again and again, until I felt*
*safe enough to decide for myself."*

Participation in planning was generally strong. Survivors describe being consulted on support plans, education choices, health appointments, and even the next place they wished to live upon leaving. They valued conversations that felt like "talking with a friend," not a formal interrogation, and the sense of being treated as part of the community rather than managed from above.

*"In most places they told me what they had;*
*here they asked what I wanted*
*—and we planned it together."*

There were, however, important caveats. A few survivors experienced language barriers that slowed understanding; others found early safety restrictions (e.g. limited phone or internet access) difficult but acceptable once explained as protective and time-limited. One account described feeling more like a passive recipient than a partner in decisions, suggesting the need for consistent practice across services. These nuances underline a common message: clear, patient communication and genuine choice-making are what transform assessment from a checklist into a respectful, trauma-informed process.

**Feeling Safe at the Shelter**

*"I felt safer in the shelter*
*than I ever did in my own home.*

*Nothing bad could reach me there."*

All survivors agreed that shelters provided a sense of safety they had not experienced elsewhere. For many, it was the first time they could sleep peacefully, free from fear that someone would find or harm them. Survivors repeatedly described shelters as hidden, protected spaces where outsiders could not enter and where they finally felt secure enough to begin recovery. Some even compared the sense of safety to being greater than what they had felt in their own homes.

The presence of staff, regular communication, and strict but clear rules were central to this sense of security. Survivors understood that rules, such as restricted outings during the first days, secrecy of the shelter address, and limits on phone or internet use, existed to protect them. Over time, these measures came to be seen not as restrictions but as safeguards. Residents valued knowing that someone would notice if they were late or failed to check in, and that staff were always ready to intervene if needed.

*"At first the rules felt strict,*
*but then I realized they were there for us,*
*to keep us alive and safe."*

Safety inside the shelter was generally described as strong, though experiences of living with others were more mixed. Some noted minor conflicts between residents, especially when people from different backgrounds were placed together, but these were seen as manageable and not threatening to overall safety. Others reported difficulties such as theft or arguments among residents, which could at times undermine the sense of security. Still, most emphasized that staff helped resolve disputes and that the shelter remained a safe place compared to the dangers outside.

*"Living with others was not always easy,*
*but even then, I never felt unprotected."*

Overall, the survivors' accounts highlight that feeling safe was not only about locked doors and secret addresses, but also about trust—trust in staff, in rules designed for protection, and in the idea that recovery could happen in a secure environment.

**Shelter as a Place of Recovery and Support**

*"In the shelter*
*I felt like a real woman:*
*I was free, respected, and understood."*

Survivors' overall experiences in shelters were overwhelmingly positive, though not without challenges. Many described the initial adjustment as difficult due to new surroundings, unfamiliar people, and strict rules. However, over time, most came to see the shelter as a home. Several explicitly contrasted it with previous placements in camps, institutions, or unsafe family settings, noting that here they felt understood, respected, and supported in ways they had never experienced before.

Shelters were not only a place of safety but also of recovery and growth. Survivors spoke of receiving psychological support, medical care, and opportunities to return to school or gain new skills. Regular therapy sessions, workshops, and simple everyday conversations with staff were described as invaluable. For some, the most important benefit was regaining peace of mind; for others, it was concrete support

with health, education, or employment. Many said the shelters gave them the strength to look ahead, set goals, and start believing in themselves again.

*"It wasn't just a place to survive,*
*it was a place where*
*I could heal and start again."*

Living conditions were generally described as clean, comfortable, and well equipped, often exceeding expectations. Survivors valued having their own space, adequate food and hygiene supplies, and the feeling that nothing essential was missing. A few pointed out shortcomings, such as a lack of outdoor space, messy co-residents, or occasional theft, but these did not overshadow the overall sense of security and dignity.

*"At first it was hard to adapt,*
*but soon I accepted it as my home*
*and treated it like one."*

Respect for privacy and personal dignity was a recurring theme. Survivors emphasized being able to withdraw when needed, having their consent sought before decisions were made, and being treated as individuals whose voices mattered. This respect was not only about physical privacy but also about recognizing their value as individuals. While a few noted difficulties with other residents, almost all agreed that staff were attentive, professional, and protective of their rights.

In sum, the shelter experience was more than accommodation for them: it was a turning point, offering not only safety but also the conditions to heal, rebuild, and imagine a different future.

**Comprehensive Care and Assistance**

*"I was extremely satisfied with the services*
*I received during my stay in the shelter.*
*Every type of support, medical, psychological,*
*legal, educational, and employment-related*
*was provided with care, professionalism, and attention to my needs."*

Survivors described receiving a wide range of services in the shelters, covering their immediate needs as well as long-term recovery and independence. Health care was one of the first forms of support: many were taken to doctors, dentists, and specialists, always accompanied by staff. Some recalled being helped through pregnancy and childbirth, others to manage chronic conditions or to restart physiotherapy that had been denied elsewhere. Almost all highlighted the importance of regular psychological support. Individual sessions with psychologists, group therapy, and daily conversations with staff helped reduce fear and anxiety, improve sleep, and restore confidence. In some cases, psychiatric treatment and medication were provided, ensuring stability and recovery.

*"Regular conversations with*
*the psychologist helped me the most.*
*They gave me strength to move forward."*

Legal assistance was equally significant. Survivors spoke about being carefully prepared before giving statements, supported at hearings, and accompanied to prosecutors' offices and courts. For those seeking asylum or residency, lawyers guided them step by step, through interviews, applications, and appeals,

until legal status and travel documents were secured. Survivors stressed that without this assistance, they would not have been able to navigate the system effectively.

Another crucial area was documentation. Many entered the shelter without birth certificates, IDs, health insurance or school records. Staff explained the procedures, filled out forms, and accompanied survivors to relevant institutions. The same support extended to registering children, accessing welfare entitlements, and applying for social benefits. Survivors often noted that staff not only gave advice but stayed with them until the process was complete.

Education and training were central to recovery. Several were re-enrolled in primary or secondary school, supported to complete grades or even graduate. Others attended vocational courses such as cooking, sewing, beauty treatments, or hospitality, often leaving with certificates that later opened the door to employment. Skills workshops inside the shelters ranged from IT and languages to creative activities and life-skills training, all of which survivors described as empowering and confidence-building.

*"With their support, I finished two grades of primary school and then secondary school. I even graduated as a cook, which I always wanted."*

Employment support built on these steps. Survivors were guided in preparing CVs, searching for jobs, and attending interviews. For some, this resulted in their first paid work, while others were advised to focus on completing school first. Either way, the transition from training to job readiness was consistently supported. Mothers received additional assistance, including antenatal care, registering children, and securing everything from nappies and clothes to toys and health checks.

*"The training at Bagel helped me get my first job. Together with your colleague I wrote a CV and soon found work."*

Daily life in the shelters was marked by respect for dignity. Survivors had their basic needs met (food, hygiene items, clothes, safe and clean-living spaces), while their privacy was protected, with staff seeking consent before decisions were made. A few challenges typical of communal living, such as conflicts or untidiness, were mentioned, but survivors underlined that staff always intervened and upheld rules. The only recurring wish was for outdoor space, to enjoy fresh air and moments of calm.

What many found most valuable was continuity. Support rarely ended at the shelter door. Survivors described how staff helped them move into independent accommodation, provided start-up packages, and kept in touch to ensure that legal, health, or emotional needs were still met. This continuity gave them the confidence to take steps towards independence.

Across all accounts, survivors spoke of services not as isolated interventions but as a pathway: from urgent medical and legal help, through education and skills-building, to employment and independent life. Staff were consistently described as respectful, patient, and dedicated. While a few survivors noted areas for improvement, such as language barriers or staff in some places seeming less engaged, the overwhelming picture is that of comprehensive, life-changing support.

**Reintegration: Preparing for Independence and Life Beyond the Shelter**

*"Today I live as I once wished—to finish school,*

*to work, to earn my own money,*
*not to depend on anyone."*

Survivors described reintegration as both a hopeful and challenging stage, shaped by the extent of preparation and continued support they received after leaving the shelter. For many, the transition was not abrupt: staff carefully guided them through each step, from finding work and housing to rebuilding confidence and independence.

Several women emphasized that the support was "step by step", moving from psychological and medical care, to skills training, then job placement, and finally independent living.

*"When I finished my courses, Atina tried to find me a job.*
*Then I wanted an apartment to make me independent.*
*Step by step: physically, mentally, then skills, then a job,*
*and finally an apartment."*

One survivor recalled receiving food, clothing, and essential household items for the first month of independent life, which made the transition less overwhelming.

The connection with staff often continued well beyond the shelter walls. Regular phone calls, visits, and ongoing emotional support gave women reassurance that they were not left on their own.

*"Even after I left, my therapist was still there for me.*
*Whenever I needed to talk,*
*I called her, and she supported me."*

For many, post-shelter help included legal guidance for court hearings, help with documents, or practical assistance in finding work and housing. Survivors noted that this long-term contact was rare in other institutions and deeply valued:

*"They didn't just take care of me while I was in the shelter.*
*After I left, they stayed, like friends.*
*That feeling of not being forgotten meant everything to me."*

Not all women, however, felt fully ready or supported. Some described leaving with fear and uncertainty, realizing only afterward how much the shelter had been their home and safety net.

*"I thought I wanted freedom, but when I left,*
*I realized freedom was not the most important thing:*
*what really matters are the people around you, understanding, and support."*

Some survivors said they needed more continuity in psychotherapy and medical support after departure, as accessing public services proved too difficult.

While most reported that they had everything necessary to start anew, including education, work opportunities, documents, and housing, there were also gaps. A few mentioned the lack of financial support for rent or food in the first months, or wished for specific activities such as sports or longer-term mental health care. For some, bureaucratic obstacles, such as residence permits, remained unresolved and delayed their independence.

Despite these challenges, the prevailing narrative was one of empowerment. Survivors stressed that with the guidance, tools, and encouragement they received, they were able to believe in themselves and face the next chapter of life.

**Gaps and Shortcomings**

*"I stayed more than one year,*
*but I cannot say I did not receive something.*
*I got everything—an apartment, shelter, everything."*

When asked about shortcomings in the services or shelter life, many survivors said they were largely satisfied and could not point to anything essential that had been missing. Several emphasized that they had received more than they expected.

Still, a few did reflect on areas that could be improved. Survivors often contrasted the dedication of shelter staff with weaker support from other institutions. Some felt that court hearings or school environments depended heavily on the individual professionals involved, sometimes supportive and sometimes not.

*"The Safe House supported me,*
*but the social welfare center in my town*
*never even called, as if they had left me."*

Restrictions on freedom and communication were the most frequently mentioned limitations. Also, for some sharing a room with several other girls was challenging, and listening to newcomers' recount traumatic experiences often reopened her own wounds.

*"Honestly, the main thing I felt was missing was freedom.*
*When I felt nervous or sad, I wanted to go for a walk,*
*but that wasn't always allowed. Not being able*
*to use phones made me feel even more anxious."*

Some also suggested small but meaningful improvements to daily life, like expanding creative activities. Others called for stricter rules on privacy or faster staff intervention when conflicts between residents arose, while one young woman observed that women with protection orders sometimes traveled unaccompanied to their home areas, which could put them at risk.

*"Maybe more workshops—jewelry making, painting*
*—things like that. You learn something new,*
*and we talk about everything during those workshops."*

Overall, though, most survivors agreed that shortcomings were minor compared to the safety, support, and opportunities they had received.

*"I am grateful for everything that was offered to me.*
*There is always some room for improvement,*
*but I didn't have major problems, and that is what matters most."*

**Suggestions for Improvement**

When reflecting on how shelters and services could be improved, survivors offered a wide range of ideas, from small, everyday changes to systemic reforms. Some emphasized the importance of greater freedom of movement.

*"It would be good if we had a little more freedom,*
*to go out more with the staff. Some people couldn't go out*
*at all because of safety, and*

*that should be worked on so they can also go out sometimes."*

*"The shelter needs to be more open,*
*and organize more excursions and outdoor activities."*

Others expressed the wish for small comforts and recreational opportunities.

*"Children should go to the swimming pool*
*sometimes, just to relax.*
*I feel sorry for them."*

Language and vocational training appeared repeatedly as priorities for the future.

*"If we have a teacher of Serbian,*
*we can learn the language, find a job,*
*live with the people, and make life much easier.*
*We need two things: language and a job."*

Others proposed more workshops:

*"More jewelry making, more painting.*
*You learn something new, and*
*we talk about everything in those workshops."*

Several survivors underlined that improvement also depends on mutual trust.

*"I think you don't need to change anything.*
*But it depends also on the woman who is here: to trust you,*
*to respect the rules, to talk openly about what troubles her.*
*I have complete trust in you."*

Others highlighted structural issues.

*"The location of the shelter should be changed.*
*There are people who know where it is,*
*and that is stressful. It should be in a more discreet location,*
*ideally a house with a small yard and flowers."*

Transitional housing after leaving was another strong recommendation:

*"When I returned to my mother's home,*
*it was not the best solution. It would have been easier*
*if there had been another place for me to stay, like a transitional home."*

The importance of survivor participation was also raised.

*"Survivors like me could be more involved in helping others…*
*I would be willing to talk to new girls, to tell them it is not scary.*
*Survivors should also have opportunities to meet with*
*decision-makers, such as ministers, to give recommendations directly."*

Others reflected on the value of community.

*"It would be great if there were more ways for everyone to gather,*
*share their stories, and help each other. Some meetings or events where we could talk,*
*laugh together, and feel like part of a big family."*

Finally, some pointed to gaps in professional expertise and resources.

*"Maybe more specialized medical services are needed when someone is going through severe trauma."*

*"There should be supervision and constant training on ethics and professionalism of staff members."*

Across all testimonies, survivors expressed gratitude for the support they had received, while also offering concrete and thoughtful suggestions to strengthen services for the future.

The testimonies of survivors highlight the transformative role of shelters, not only as places of safety, but as environments where healing, learning, and growth become possible. Survivors described receiving crucial support for their health, education, skills, and reintegration, often stressing that staff stood beside them at every step. At the same time, they were clear about what could be strengthened: more freedom of movement, specialized services, continued support after leaving, and greater involvement of survivors themselves in shaping responses.

Above all, their voices emphasize that effective protection and recovery are not achieved through rules or services alone, but through trust, respect, and genuine human connection. It is this combination that enabled survivors to move forward, regain independence, and envision a different future.

## Models of Good Practice in Victim Protection and Sheltering in Europe

Several interviewees stressed that LEFÖ-IBF in Austria, the Belgian system of specialized centers, and FIZ in Switzerland stand out as models of good practice. They underlined that the formal mandate by the state, stable public funding, and the provision of comprehensive shelter and reintegration services make these examples particularly effective and worthy of replication. Interviewees also noted that it is understandable they look up to European shelters, given the similarities of the systems, while recognizing that many other good practices exist elsewhere but are not replicable in the current circumstances.

**LEFÖ-IBF (Vienna, Austria)**

LEFÖ-IBF[2], the Intervention Centre for Trafficked Women, is Austria's only organization officially mandated at the federal level to provide comprehensive protection and assistance to trafficked women and girls. Recognized under §25(3) of the Security Police Act, it operates with mandates from the Ministry of the Interior, the Federal Ministry of Women, Science and Research, and the Ministry of Justice. These mandates give LEFÖ-IBF the authority to deliver psychosocial and legal victim assistance across the entire country and to support women in judicial proceedings.

Its financing model is hybrid but primarily grounded in public subsidies. The Ministry of the Interior funds activities related to victim protection, cooperation with police, safe return, and residence permits, while the Federal Ministry of Women and the Federal Chancellery support work on women's rights, equality, and integration. The City of Vienna contributes through project grants, particularly for integration and women's services. Supplementary resources are drawn from EU and international projects such as Daphne, AMIF, and ISEC, while private donations and foundations provide a smaller but symbolically important share. This structure ensures relative stability compared to NGOs in other regions, although concerns remain about the adequacy of resources for long-term housing and specialized care.

As a shelter provider, LEFÖ-IBF offers protection apartments with secret addresses, emergency accommodation, and independent living units with initial psychosocial assistance. Its services cover the full spectrum of needs: 24-hour reachability, psychosocial and psychological support, psychotherapy, health and life counselling, access to medical services, and help with employment and housing. Legal assistance is central, ranging from accompaniment to police interrogations to psychosocial and legal support in court proceedings. The organization also assists detainees pending deportation in suspected trafficking cases, carries out online outreach for early identification, and prepares women for safe returns through risk assessments in cooperation with partners abroad. Integration support is broad, including German language courses, further education, a buddy program, and mediation into the labor market.

LEFÖ-IBF works with women and girls aged 15 and above, predominantly migrants, who have been trafficked for sexual or labor exploitation, domestic servitude, or other forms of abuse. Importantly, access to support is not conditional upon formal victim identification, enabling also asylum seekers and potential/presumed victims to benefit. The organization operates confidentially, anonymously, and free

[2] https://lefoe.at/en/ibf-intervention-center/

of charge, guided by feminist, anti-racist principles and a strong commitment to the autonomy and self-determination of its clients.

**Belgium's Specialized Centers: *Pag-Asa*, *Payoke*, and *Sürya***

Belgium has developed one of the most advanced victim protection systems in Europe through its three specialized centers for VoTs: *Pag-Asa*[3] in Brussels, *Payoke*[4] in Antwerp, and *Sürya*[5] in Liège. Each is formally recognized and authorized by the Belgian state to provide accommodation, legal support, psychosocial assistance, and reintegration services for victims who are granted a recognized status. This legal framework ensures that VoTs have access to a safe and structured program of support linked directly with the judicial process.

The financing of these centers reflects their institutional position. Their core funding comes from the federal government, specifically through the Federal Public Service Justice and the Federal Public Service Social Integration. This provides structural, multi-year subsidies and secures continuity of services. Additional contributions are sometimes provided by regional and community authorities for integration, housing, or social support projects. The centers also access EU project funds for prevention or capacity-building initiatives, and accept private donations or foundation grants, although these represent a smaller share of income. Belgium is widely regarded as a good practice model precisely because of its structural federal funding, which contrasts with reliance on short-term donor projects in many other countries.

The assistance offered is both holistic and individualized. Victims are housed in safe shelters. *Pag-Asa*'s facility provides 16–21 individual rooms with private bathrooms, common areas, and the capacity to host women, men, and small families. The average stay is three to nine months, though longer guidance is possible through transition apartments and housing projects. *Payoke* in Antwerp manages a shelter with 22 places, while *Sürya* in Liège accommodates 16 persons in five apartments. Victims receive legal advice and are supported in criminal proceedings through close cooperation with police, prosecutors, and labor inspectorates. Social workers address daily life challenges, while administrative assistance helps victims secure healthcare, insurance, training, and labor market access. Specialized housing projects such as transition apartments, housing coaching, and a rental deposit fund support long-term independence. Psycho-social support is continuous, combining individual counselling with group activities, cultural outings, and workshops. These centers cooperate closely, and when one shelter is full, VoTYs are referred to the other two.

The centers work with a broad range of victims: women, men, and families exploited for sexual or labor purposes, with guidance lasting as long as necessary to complete judicial proceedings and restore autonomy. A reflection period of 45 days ensures that victims have time to decide on their future, after which support may continue for two to three years or longer. Each center develops a tailored plan with the victim, ensuring support that is adapted to their needs, skills, and aspirations.

[3] https://pag-asa.be/
[4] https://www.payoke.be/en/
[5] https://www.asblsurya.org/

**FIZ – Fachstelle Frauenhandel und Frauenmigration (Zurich, Switzerland)**

FIZ[6] in Zurich, founded in 1985, runs Switzerland's nationally recognized protection program for trafficked women, known as *Makasi*. It is officially mandated by the State Secretariat for Migration and the Federal Office of Police, and operates in cooperation with cantonal authorities. In nine cantons, including Zurich, Bern, Basel, and Lucerne, FIZ is mandated to provide victim support and participates in or chairs round tables against THB. This dual role, direct assistance and systemic coordination, has made FIZ a central actor in Switzerland's anti-trafficking response.

Its financing structure combines multiple sources. Federal funds from SEM and fedpol cover the core protection mandate, including safe housing, victim counselling, and legal aid. Structural subsidies are also provided by the Canton and City of Zurich, while other cantons contribute financially when FIZ assists their residents. Project-based funding from federal or international programs, such as EU or UN initiatives, adds further resources. Private foundations and charitable trusts, often focused on women's rights or migration, supply an important supplementary share, while donations, legacies, and memberships provide ongoing community support. The result is a relatively stable financial base compared to NGOs in Western Balkans, though still subject to pressures from project cycles and private fundraising.

As a shelter provider, FIZ operates small, protected apartments at secret locations rather than large collective facilities. This model offers security and anonymity while enabling tailored support. Victims receive counselling under the Swiss Victims Assistance Act, crisis intervention, psychosocial and trauma support, and organized access to financial assistance. FIZ provides legal advice on residence status, accompanies victims through criminal proceedings as a trusted party, and liaises with authorities, lawyers, doctors, and therapists. It supports voluntary return to the country of origin when chosen, and offers assistance for social and professional integration for those remaining in Switzerland. Services are confidential, free of charge, and accessible regardless of whether the victim cooperates with law enforcement.

The *Makasi* program is designed for women who have been trafficked for sexual or labor exploitation. FIZ's approach is victim-centered and rights-based, ensuring that even those without formal victim status or unwilling to testify can still access safety, counselling, and long-term support. Through its shelters, counselling, and coordination roles, FIZ bridges immediate protection with longer-term reintegration in the Swiss context.

[6] https://www.fiz-info.ch/en/Welcome

# Conclusions and Recommendations

Across Albania, BiH, Montenegro, North Macedonia, and Serbia, THB presents with broadly similar patterns while responses differ in design and consistency. Children are highly represented everywhere; migrants and foreign nationals are persistently under-identified; labor exploitation is on the rise but continues to be insufficiently addressed. Identification frameworks exist and are not conditional on cooperation with law enforcement, but practice is uneven and largely reactive, with proactive outreach strongest where NGO-led mobile teams operate.

Shelter provision exists in all five countries but remains limited in scale, particularly for men and younger children, and is further strained by complex needs, such as mental health issues, substance dependence, and disabilities. NGO providers ensure professionalism and continuity, with services often sustained more by staff enthusiasm than state support. However, sustainability is undermined by short funding cycles, retroactive reimbursements, and the absence of stable, multi-year public financing. Licensing/standards frameworks exist in varying forms; they tend to be burdensome, inconsistently applied, and only weakly linked to quality assurance or funding guarantees. Core services are comparable, but access to specialized care and long-term reintegration pathways is uneven and project-dependent. Reintegration is the weakest link: transitional housing, steady income, and sustained case-management are scarce, leaving beneficiaries vulnerable to poverty, marginalization and re-exploitation.

Two groups of recommendations emerged from this study. The first comprises policy-level recommendations aimed at building or strengthening systemic, structured, and sustainable responses to the key gaps in victim support identified across the region. The second consists of actionable recommendations intended to enhance the professional capacities of shelters and improve the effectiveness of their work. While not equally applicable in every national context, whether because certain measures are already in place or because they are not relevant, they nonetheless offer a practical framework for advancing practice.

**POLICY-LEVEL RECOMMENDATIONS**

**Identification:**

- Strengthen proactive and consistent screening of vulnerable groups to address persistent under-identification of victims;
- Ensure proper application of indicators while avoiding over-identification of children whose vulnerabilities are not linked to exploitation.

**Licensing and standards:**

- Revise existing licensing systems to ensure transparency, equal application to state and non-state providers, and the inclusion of comprehensive standards for victim support, criminal-record checks, mandatory certified training, re-licensing, and continuous education;
- Establish licensing systems where they do not exist, embedding specialization sensitive to the differing needs of women, men, girls, boys, and foreign nationals, while avoiding competition from non-specialized organizations that undermines experienced NGOs**.**

**Financing:**

- Secure predictable, adequate, and sustainable public funding for shelters and related services through permanent budget lines or multi-year agreements;
- Ensure financing covers staff salaries, operational costs, and specialized support, while reducing dependence on short-term donor projects**.**

**Specialized services and sheltering:**

- Expand and adapt specialized services to cover all categories of victims, including men, boys, and children;
- Strengthen responses to mental-health, addiction, and other complex support needs;
- Ensure appropriate accommodation through expanded shelter capacities, including dedicated shelters for men, separate facilities for children, and alternatives such as foster care, halfway houses, and transitional housing;
- Tailor programs to emerging forms of exploitation and ensure regular supervision and psychological support to professionals.

Reintegration:

- Develop and strengthen long-term reintegration services, including housing, education, vocational training, employment, and community support, with particular attention to children, men, and VoTs with complex needs;
- Involve other systems and institutions, at both local and national levels, in reintegration efforts to ensure continuity of support. Effective reintegration cannot be achieved by shelters alone, but it requires coordinated engagement of social welfare, education, health care, employment services, and local authorities to reduce the risks of re-trafficking and support VoTs' equal participation in society.

**ACTIONABLE RECOMMENDATIONS**

**Advocacy and partnerships**

- **Comprehensive minimum standards:** advocate for the adoption of stand-alone minimum standards for victim support, developed specifically for practitioners at all levels, rather than as annexes to other documents or solely tied to licensing requirements**.**
- **Document and publicize impact**: systematically collect beneficiary feedback, success stories, and outcome data to use in advocacy for sustainable funding and policy improvements.
- **Build coalitions**: coordinate with other specialized NGOs (e.g. national coalitions, women's rights networks) to advocate jointly for predictable funding and fair licensing criteria.

- **Promote survivor voices**: include survivors in awareness campaigns, roundtables, and policy dialogues to strengthen legitimacy of advocacy messages.
- **Regional best-practice exchange**: build on existing regional networks to strengthen the exchange of experiences and good practices on licensing, funding, and the overall operation of shelters, recognizing that each country has valuable models to share.

**Funding and sustainability**

- **Prepare costed advocacy briefs**: calculate realistic per-day and per-service costs and present them to ministries/municipalities as a basis for negotiations.
- **Pilot innovative models**: test transitional apartments, housing coaching, or social enterprises through project grants, then advocate for state uptake.

**Licensing and quality**

- **Highlight expertise**: demonstrate specialized knowledge (trauma-informed care, child safeguarding, work with migrants) in reports and proposals to stand out from non-specialized competitors.
- **Self-regulate**: adopt internal quality standards (complaint mechanisms, supervision, case reviews) even if not required by law, and use them in advocacy to argue for realistic state standards.

**Reintegration and community-based alternatives**

- **Build local partnerships**: connect beneficiaries with vocational schools, employers, and housing initiatives at municipal level.
- **Create small-scale pilot projects**: transitional housing units, scholarship schemes, or job placements can be run with donor funds and showcased to governments as models worth scaling.
- **Maintain long-term contact**: develop simple follow-up protocols (calls, visits, WhatsApp groups) for at least 12–18 months post-exit, even if formal reintegration programs are absent.

**Staff wellbeing and burnout prevention**

- **Integrate staff care into projects**: include budget lines for regular supervision, retreats, or counselling in donor proposals.
- **Peer support systems**: organize monthly peer-review sessions or reflective practice groups within or across organizations.
- **Advocate for recognition**: push donors and authorities to acknowledge staff wellbeing as a core quality criterion.

# Annexes

## Annex 1 – List of Key Informants

**Albania**

- Mariana Meshi, Director, NGO Different and Equal – Tirana
- Xhensila Murati, Director, NGO Psycho-social Center Vatra – Vlore
- Diana Kasa, Director, NGO Tjeter Vizion Association – Elbasan
- Irena Kraja, Anti-Trafficking Program Leader, NGO Mary Ward Loreto – Tirana
- Suela Asllani, Director, National Reception Centre for Victims of Trafficking
- Shqiponja Dorzi, psychologist, Reception Centre for Asylum Seekers - Tirana
- Kejsi Musai, social worker, Reception Centre for Asylum Seekers – Tirana

**Bosnia and Herzegovina**

- Dragana Petrić, Director, NGO *Lara* – Bijeljina
- Milka Stević, Team Coordinator, NGO *Lara* – Bijeljina
- Gordana Vidović, Director, NGO *Budućnost* – Modriča
- Aida Behrem, Director, NGO Žene sa Une – Bihać
- Amela Burić Ovnović, NGO Žena BiH – Mostar
- Stanislava Tanić, Head of Department, Ministry of Security BiH, Anti Trafficking Department
- Nikša Gligić, Anti-Trafficking Coordinator of Republika Srpska, Ministry of the Interior of Republika Srpska
- Muris Selimović, Head of Readmission Department, Ministry of Security BiH, Service for Foreigners Affairs

**Montenegro**

- Nataša Međedović, Executive Coordinator, SOS Hotline for Women and Children Victims of Violence Nikšić
- Nada Koprivica, SOS Hotline for Women and Children Victims of Violence Nikšić
- Jovana Radifković, Head of the Directorate for Protection from Gender-Based and Family Valence, Ministry of Social Welfare, Family Care and Demography
- Jelena Raičević, Team for Formal Identification of Victims of Trafficking, Ministry of Social Welfare, Family Care and Demography

**North Macedonia**

- Marija Todorovska, Program Director, NGO Open Gate/La strada – Skopje
- Ivana Kekeva, Program Coordinator, NGO Open Gate/La strada – Skopje
- Eva Ilievska, Deputy Coordinator, National Commission for Combating Human Trafficking and Illegal Migration

- Ana Burageva, General Adviser, National Commission for Combating Human Trafficking and Illegal Migration
- Irena Mitrovska, social worker, coordinator of the Mobile Team Skopje

**Serbia**

- Lidija Đorđević, Program Coordinator for Direct Support to Victims of Human Trafficking, NGO *Atina* – Belgrade
- Jelena Matić, Office for Coordination of Anti Trafficking Activities, Ministry of the Interior
- Miroslav Jovanović, Head of the Agency for Coordination of Victim Protection, Center for Trafficking Victims' Protection
- Jelena Živojinović, Head of the Shelter for Victims of Trafficking, Center for Trafficking Victims' Protection

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