

POLICY RECOMMEN- DATIONS



REACH

REACH

Resilience through Enhanced Access to Comprehensive Help

Strengthening Protection for Victims and Survivors of
Sexual Violence in Exploitation and Trafficking

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Between 2025 and 2027, the International Rescue Committee Deutschland (IRC DE), together with four specialised anti trafficking partner organisations: BeFree Società Cooperativa Sociale in Italy, Fundación de Solidaridad Amaranta (FSA) in Spain, Verein für internationale Jugendarbeit e.V. (VIJ / FIZ) in Germany and Mission d'Intervention et de Sensibilisation contre la Traite des Êtres Humains (MIST) in France and the startup WE Encourage Ltd (Finland) is implementing the project **“Resilience through Enhanced Access to Comprehensive Help — Strengthening Protection for Victims and Survivors of Sexual Violence in Exploitation and Trafficking” (REACH)**. The project is funded under the European Union's Citizens, Equality, Rights and Values (CERV) Programme, Daphne strand.

REACH addresses the need for support and protection for victims and survivors of sexual violence in the context of exploitation and trafficking including sexual exploitation, sexual slavery and servitude, forced or coerced prostitution, and forced marriage with a particular focus on migrant and refugee women, across France, Germany, Italy and Spain. The project pursues three complementary goals: (1) increasing awareness of, and low-threshold access to, gender-sensitive protection and support services, including through a multilingual conversational chatbot (AinoAid™) and a survivor-led helpline piloted in France; (2) strengthening the capacity of both specialised and non-specialised service providers to detect, refer and support survivors through study visits, a best-practice toolbox and a training and webinar series; and (3) informing policy- and decision-makers of best practices and evidence-based recommendations to strengthen legislation and policy at national and EU level.

This document responds to the third objective. It is the main deliverable of Work Package 4 “Advocacy and Engagement with Policy and Decision Makers”, Task 4.1. In line with the project's design, the recommendations are informed by the direct programming experience of all consortium partners and by shared learnings gathered throughout implementation. They are addressed, first, to EU-level policy processes, in particular the effective implementation of the revised Directive on preventing and combating trafficking in human beings (Anti-Trafficking Directive) and of the new Directive on combating violence against women and domestic violence (GBV Directive) and, second, to national and local

authorities, reflecting country-specific dynamics such as Germany's forthcoming National Action Plan against trafficking, France's national referral mechanism and survivor-led helpline, Spain's pending comprehensive anti-trafficking law, and Italy's long-standing model of separating protection from cooperation with judicial authorities.

Tackling sexual violence, exploitation and trafficking in human beings is a comprehensive effort spanning prevention, protection, prosecution and partnerships (the so-called “four Ps”). REACH's advocacy work is centred on strengthening access to protection and support, in particular through early identification, safe referral and meaningful survivor participation, without losing sight of the fact that these four areas of action are deeply interlinked.

This document is organised into six sections. Following this introduction, the methodological note explains how the recommendations were developed. The third section situates the phenomenon of sexual violence, exploitation and trafficking of migrant and refugee women in the current EU context. The fourth section outlines the evolving EU legal and policy framework (the revised Anti-Trafficking Directive, the GBV Directive and the Pact on Migration and Asylum) and the challenges partners have identified in its implementation. The fifth section presents the barriers to protection and access to services, and the promising practices, that emerged through the consortium's direct experience. The sixth section sets out the policy recommendations, addressed respectively to the European Commission, to EU Member States, and to both, each substantiated with the evidence gathered.

2. METHODOLOGICAL NOTES

These recommendations draw on qualitative evidence gathered directly from the REACH consortium. Using a shared Core Interview Guide developed for this purpose, semi-structured interviews of approximately one hour were conducted by IRC Project Manager with each of the four partners directly engaged in frontline service provision and country-level advocacy: Fundación de Solidaridad Amaranta (Spain), BeFree (Italy), MIST (France) and VIJ/FIZ (Germany).

The guide combined common questions on project achievements and lessons learned, barriers to accessing protection and services, coordination gaps between specialised organisations and public authorities, and the implementation of the revised Anti-Trafficking Directive, the GBV Directive and the Pact on Migration and Asylum with partner-specific modules exploring each organisation's particular area of expertise: FSA's

experience supporting women and girls and coordinating with the asylum system; BeFree's work at the intersection of trafficking and gender-based violence; MIST's survivor-led helpline pilot and survivor participation model; and VIJ/FIZ's support for survivors within the German asylum system and its implications for Germany's forthcoming National Action Plan.

2.1 LIMITATIONS

These findings should be read with several limitations in mind. The consortium partners and most questionnaire respondents are specialised in sexual exploitation of women and in gender-based violence; few work primarily on labour exploitation, forced criminality, or trafficking of men and boys. The evidence gathered therefore reflects a particular vantage point, and the framing of trafficking as principally a manifestation of gender-based violence, articulated most forcefully by BeFree, and analytically compelling for the population REACH serves, should not be taken as characterising all forms of trafficking in human beings equally. Eurostat data for 2024 record a marked increase in victims trafficked for forced labour or services, and 37% of registered victims were men or boys. Where this report identifies gaps in provision for these groups, it does so on the basis of partners' observations of what their own systems fail to cover, not on the basis of evidence gathered from services specialising in them.

The questionnaire, with 16 respondents, is a validation and prioritisation exercise rather than a representative survey. Two organisations (BeFree and Fundación de Solidaridad

Amaranta) account for seven of the sixteen responses, and all respondents were drawn from the consortium's own professional network, which shares a broadly protection-oriented outlook; small differences in average rank should not be treated as statistically meaningful. The rankings capture practitioners' assessment of urgency, not measured incidence or unmet need. Geographically, the evidence is concentrated in France, Germany, Italy and Spain, with limited input from Central and Eastern European Member States and none from major countries of origin. Finally, interviews were conducted by the IRC Project Manager as a consortium partner rather than by an independent researcher, and non-English material was translated for analysis. The recommendations that follow are accordingly presented as the considered, experience-based judgement of frontline specialised organisations, not as generalisable empirical findings.

3. SEXUAL VIOLENCE, EXPLOITATION AND TRAFFICKING OF MIGRANT AND REFUGEE WOMEN IN THE EU

Trafficking in human beings and other forms of sexual violence continue to affect a significant number of people across the European Union, with women and girls consistently over-represented among identified victims. According to the most recent Eurostat data, 9,678 victims of trafficking were registered across the EU in 2024; nearly two-thirds (63%) were women or girls.

Sexual exploitation remains the most frequently recorded form of exploitation, although the number of victims identified for forced labour or services has grown markedly over the past six years.¹ In terms of citizenship, 28% of registered victims in 2024 held the citizenship of the reporting country, 8% that of another EU Member State, and 64% that of a non-EU country, underlining both the transnational character of the phenomenon and its close entanglement with migration and asylum systems.²

As highlighted throughout the interviews conducted for this report, official statistics substantially understate the scale of the phenomenon. Migrant and refugee women are descri-

bed by all four partners as a particularly at-risk group: many have experienced violence, including domestic violence, sexual violence, forced marriage or other forms of discrimination, before ever being trafficked, and go on to face further physical, sexual, psychological and economic violence as instruments of control during exploitation. This continuum of violence, rather than a single discrete harm, is central to understanding why migrant and refugee survivors often do not recognise themselves as victims of trafficking, particularly when, after long and dangerous migration journeys, exploitation may be perceived as the only available means of survival.

^{1, 2} Eurostat, "Trafficking in human beings statistics", data extracted January 2026.

BeFree, Italy

“Trafficking is, first and foremost, a form of gender-based violence. It is not only about economic exploitation, but is rooted in relationships of power, control and coercion that disproportionately affect women and girls and are deeply embedded in gender inequality. [...] A woman should not be forced to choose between being considered a ‘victim of trafficking’ or a ‘victim of gender-based violence’: very often she is both, and needs an integrated response.”

This intersection between trafficking and gender-based violence, and the practical consequence that survivors are too often required to navigate separate, poorly coordinated systems

of protection, recurs across all four national contexts covered by REACH, and directly shapes the recommendations set out in this report.

3. Sexual violence, exploitation and trafficking of migrant and refugee women in the EU

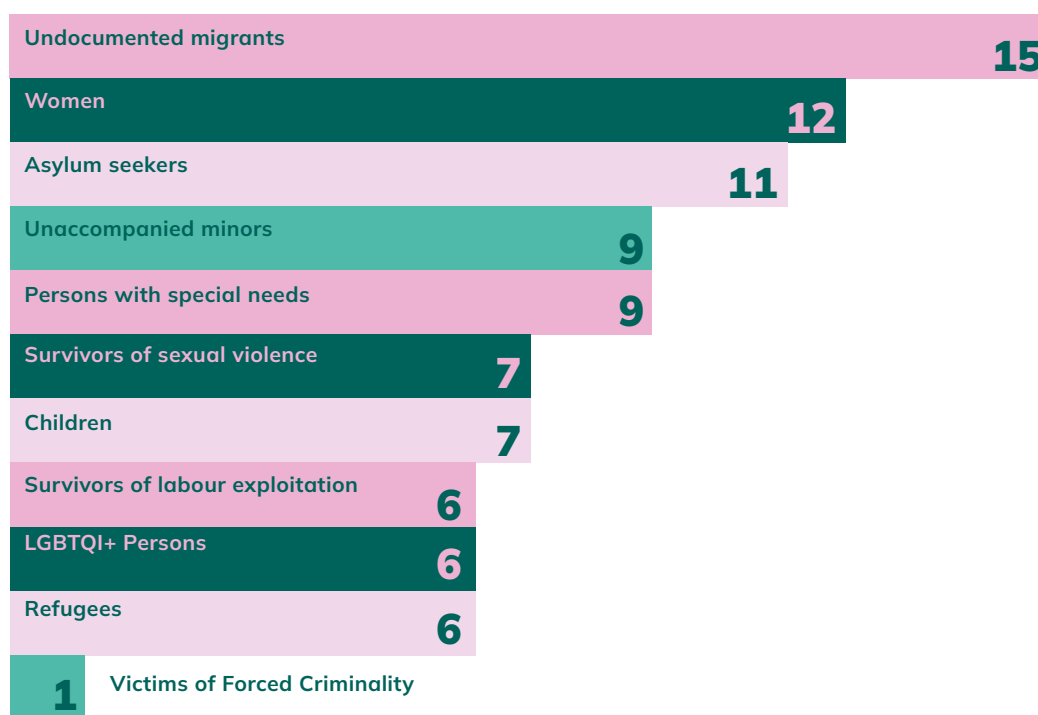
The questionnaire confirms this picture: asked which groups face the greatest barriers to accessing protection, the 16 respondents most frequently pointed to undocumented migrants, followed by women, asylum seekers, and unaccompanied minors and persons with special needs, with survivors of sexual violence and of

labour exploitation also cited by more than a third of respondents. This reflects the compounding of vulnerabilities that partners described in the interviews: migration status, gender, age and the nature of the exploitation experienced rarely act as separate, isolated barriers, but combine to push particular groups further from protection.

Groups identified by questionnaire respondents as facing the greatest barriers to accessing protection (multiple selections possible, n=16).

FIGURE 1

GROUPS IDENTIFIED AS FACING THE GREATEST BARRIERS TO PROTECTION



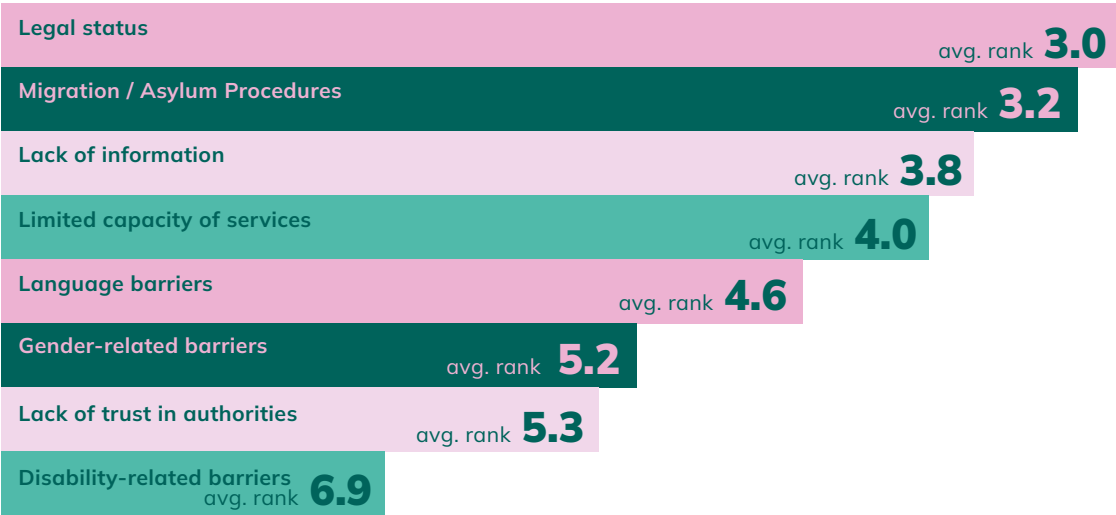
Number of respondents selecting this group (out of 16)

16

When asked to rank the barriers policymakers should prioritise, respondents placed legal status and migration/asylum procedures at the top, ahead of lack of information, service capacity and language barriers, with gender-related barriers, mistrust of authorities and disability-related barriers ranked as relevant but somewhat less urgent. This ordering is consistent with the

interviews: partners across all four countries described legal status and the shape of migration and asylum procedures as the barrier most directly within policymakers' control to change, whereas capacity, information and trust gaps, while equally real, are seen as somewhat more dependent on sustained resourcing and cultural change over time.

FIGURE 2
BARRIERS POLICYMAKERS SHOULD PRIOTITISE, RANKED BY RELEVANCE



Barriers to accessing protection, ranked by relevance for policy prioritisation (average rank across 16 respondents; longer bar = higher priority).

Priority score (higher = ranked more urgent by respondents)

4. THE EVOLVING EU LEGAL AND POLICY FRAMEWORK

REACH's advocacy work engages with three major, closely interlinked pieces of EU legislation that are currently entering into force or application: the revised Anti-Trafficking Directive, the new Directive on combating violence against women and domestic violence, and the EU Pact on Migration and Asylum. Their staggered timelines mean that Member States are, at the time of writing (August 2026), at very different stages of transposition and operational implementation, creating both a window of opportunity for EU-level guidance and a real risk of continued fragmentation.

4.1 THE REVISED ANTI-TRAFFICKING DIRECTIVE

³ KOK — Bundesweiter Koordinierungskreis gegen Menschenhandel, "Implementation of the EU Human Trafficking Directive Brooks No Delay", press statement, 13 July 2026; Ana P. Santos, "Explainer: The EU's anti-trafficking directive", Info-Migrants, 20 July 2026.

Directive (EU) 2024/1712, amending the 2011 Anti-Trafficking Directive (2011/36/EU), was adopted on 13 June 2024 and entered into force on 14 July 2024. It expands the non-exhaustive list of forms of exploitation to include forced marriage, illegal adoption and the exploitation of surrogacy; extends the non-punishment principle to cover all unlawful activities victims were compelled to carry out; introduces an obligation for Member States to criminalise the knowing use of services provided by a trafficking victim; requires the appointment of national anti-trafficking coordinators and the adoption of regularly updated National Action Plans; and reinforces the establishment of transparent, harmonised national referral mechanisms. Member States were required to transpose the Directive into national law by 15 July 2026, a deadline that has only just passed at the time of writing, and one which, according to REACH partners, several Member States have not met.³

Partners interviewed for this report broadly welcomed the Directive's direction of travel but flagged persistent implementation risks. In Spain, transposition has been delayed pending a broader comprehensive anti-trafficking law that is unlikely to be approved within the current parliamentary term, leaving open questions about the scope of non-punishment and how the new national coordinator role will

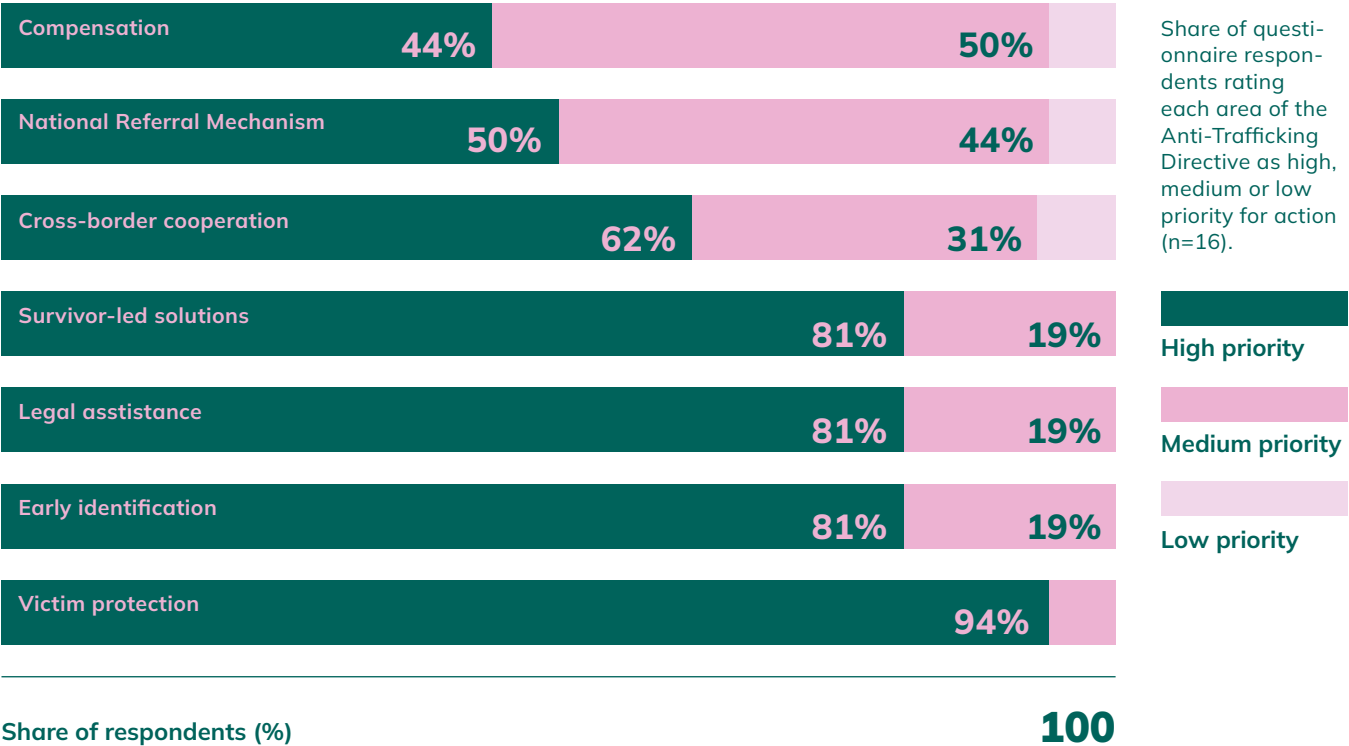
function in practice. In France, a national plan exists, coordinated by the Interministerial Mission for the Protection of Women against Violence and the Fight against Human Trafficking (MI-PROF), with input from organisations including MIST, but the national referral mechanism it foresees has not yet been launched, a delay attributed less to weaknesses in the plan's content than to limited resources and a slow pace of political implementation. Partners in Italy and Germany similarly stressed that the Directive's real impact will depend on Member States' willingness to invest in early identification, specialised and multidisciplinary training, and the resourcing of national referral mechanisms, rather than on the letter of the transposing law alone.

One provision drew a note of caution from BeFree: while the inclusion of surrogacy exploitation reflects the Directive's broadened understanding of trafficking, current evidence does not indicate that this constitutes an emerging or widespread form of trafficking in Europe, whereas sexual and labour exploitation continue to account for the large majority of cases. The concern raised is that political attention and resources risk being redirected toward a still poorly documented phenomenon at the expense of consolidating the response to established, well-evidenced forms of exploitation.

The questionnaire asked respondents to rate the urgency of action on seven areas covered by the Directive. Victim protection and early identification were rated “high priority” by the largest share of respondents (94% and 81% respectively), followed closely by legal assistance, cross-border cooperation and the National Referral Mechanism. Compensation, while still rated a priority

by a majority, was more often rated “medium” rather than “high” priority, suggesting that, in respondents' assessment, the most urgent gaps lie in promoting survivor led solutions, getting identification and referral right first, as the foundation on which access to compensation and survivor leadership can subsequently be built.

FIGURE 3
URGENCY FOR ACTION ON THE REVISED ANTI-TRAFFICKING DIRECTIVE, BY THEME



4.2 THE DIRECTIVE ON COMBATING VIOLENCE AGAINST WOMEN AND DOMESTIC VIOLENCE

Directive (EU) 2024/1385, the first EU-level instrument specifically addressing violence against women and domestic violence, was adopted on 14 May 2024 and must be transposed by Member States by 14 June 2027. It criminalises a defined set of offline offences (including female genital mutilation and forced marriage) and online offences (non-consensual sharing of intimate images, cyberstalking, cyberharassment and cyber incitement to hatred or violence), and requires Member States to put in place measures on prevention, protection and support of victims, access to justice, and coordination between authorities.

REACH partners see clear, if partial, opportunities in this Directive for strengthening protection of trafficking survivors, even though it is not itself a trafficking instrument. Its emphasis

on specialised assistance, a trauma-informed approach, individual needs assessment and coordination between services was described as capable of reinforcing identification and support pathways for trafficking victims, provided that its implementation is deliberately linked to that of the Anti-Trafficking Directive, rather than treated as a parallel, disconnected process. Partners also highlighted the Directive's criminalisation of digital forms of violence against women as a potential entry point for addressing technology-facilitated trafficking: the use of social media, messaging platforms and dating or job-advertising sites by traffickers to recruit, control or advertise victims, an area partners across the consortium described as growing but still inadequately addressed by either instrument on its own.

4.3 THE PACT ON MIGRATION AND ASYLUM

The ten legislative instruments making up the EU Pact on Migration and Asylum, adopted in 2024, entered into application across all Member States on 12 June 2026, following a two-year transition period. The Pact introduces mandatory registration, identity, security, health and vulnerability screening for irregular arrivals; establishes clearer rules on the Member State responsible for examining an asylum application; and provides for mandatory accelerated border procedures for applicants unlikely to qualify for international protection, deemed to pose a security risk, or considered to have misled the authorities.

The Pact was, at the time of the interviews, the framework about which REACH partners expressed the greatest concern. Across all

four countries, partners described the Pact's initial screening and accelerated border procedures as poorly suited to the realities of trafficking identification: disclosure of trafficking rarely occurs during a first interview, and trauma, fear, ongoing coercive control by exploiters, and mistrust of authorities can all prevent indicators from surfacing during a brief triage. Partners raised a related risk that indicators sometimes associated with trafficking, such as false documents, inconsistent statements, non-cooperation or unclear identity, may be read primarily as grounds for channelling a person into accelerated border procedures rather than as possible signs of exploitation requiring specialised assessment.

BeFree, Italy

“There is a risk that certain indicators of trafficking, such as false documents, inconsistent statements, lack of cooperation or unclear identity, are interpreted mainly as triggers for accelerated border procedures, rather than as possible signs of exploitation. For this reason, it is essential that vulnerability assessments involve trained personnel and specialised organisations from the very beginning.”

FSA raised similar concerns about the practical operation of vulnerability screening in Spain: assessments are expected to be conducted by law-enforcement officials rather than specialised professionals, with only limited clarity on whether trafficking-specific training (beyond general input from IOM and UNHCR) will systematically reach those conducting them; initial health assessments, similarly, need not be carried out by doctors. MIST, in France, pointed to comparable

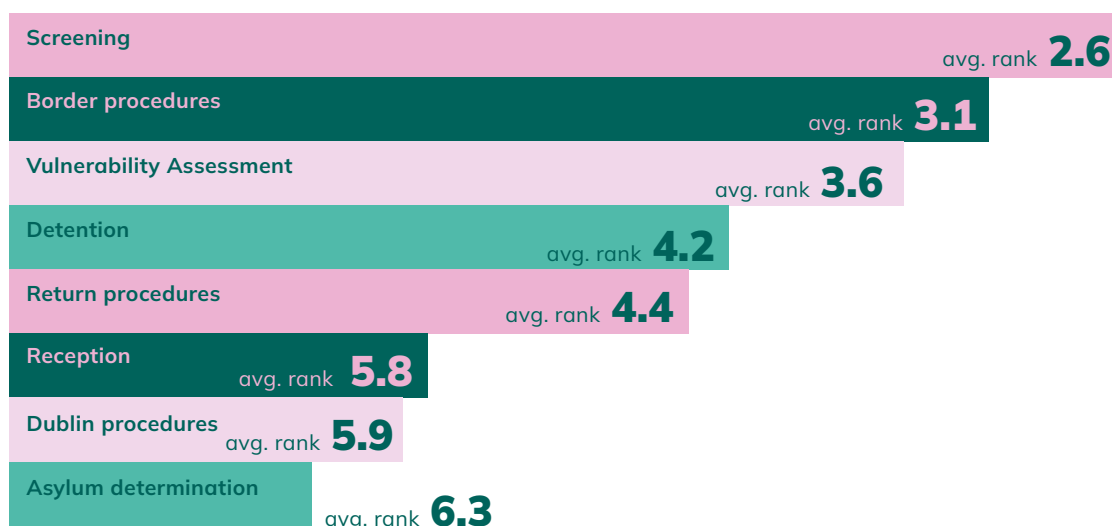
uncertainty about which professionals will carry out identification under the Pact and what qualifications they will hold, as well as a lack of clarity on the operation of the “third-country hub” return mechanism the Pact provides for: where such hubs will be located, who will staff them, and how asylum requests will be processed there, which partners fear could further reduce access to protection and increase the risk of discrimination against survivors.

The questionnaire results reinforce this concern and sharpen it. Asked to rank the stages of the migration and asylum process posing the greatest trafficking and GBV risk, respondents most frequently placed screening first, closely followed by border procedures and the vulnerability assessment itself, the very stages the Pact relies on for early detection. Detention and return procedures were also ranked as high-risk, while

reception, Dublin procedures and asylum determination, although still a concern, were ranked as comparatively lower-risk stages. This ordering suggests that respondents see the greatest danger not in any single downstream stage, but concentrated at the point of first contact, precisely where the Pact's new mandatory screening and accelerated procedures apply.

FIGURE 4
STAGES OF THE MIGRATION AND ASYLUM PROCESS
POSING THE GREATEST TRAFFICKING AND GBV RISK,
AS RANKED BY RESPONDENTS

Stages of the migration and asylum process ranked by trafficking and GBV risk (average rank across 16 respondents; longer bar = higher risk).



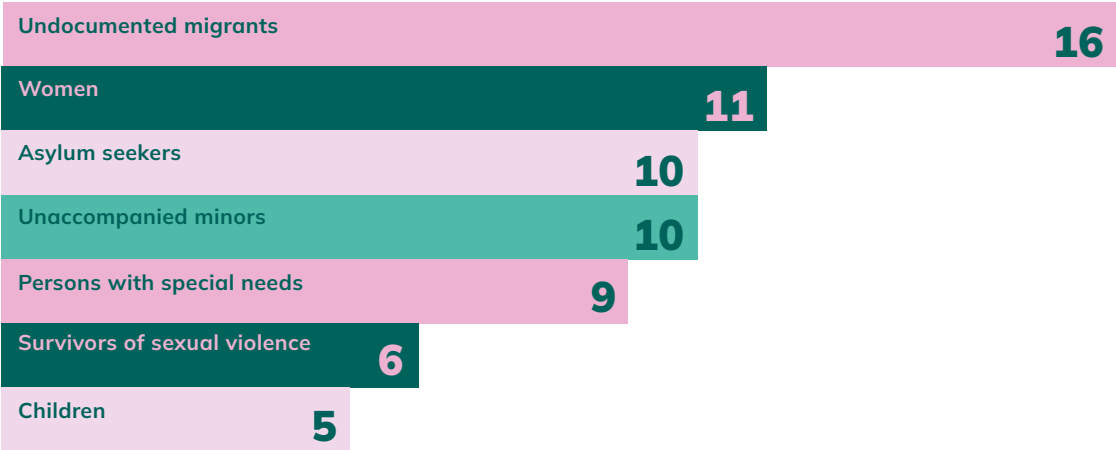
Risk score (higher = ranked as posing greater risk by respondents)

At the same time, partners identified genuine opportunities within the Pact and the wider legal framework, provided implementation is steered in a protective direction: a strengthened recovery and reflection period, giving presumed victims a protected space to exit the influence of exploiters and make informed decisions; the possibility of reviving national protection instruments (such as Italy's Article 18 residence permit) as a complement to international protection; and a push toward greater formalisation of referral mechanisms between authorities and specialised services. Realising these opportunities, in partners' assessment, depends above all on the explicit, resourced and early involvement of specialised anti-trafficking and GBV organisations in vulne-

rability assessment and triage, rather than leaving this to law enforcement alone.

Asked which actors should play a greater role in implementing the Pact, every single respondent named anti-trafficking NGOs, and large majorities also named GBV service providers, child protection experts and health professionals, with asylum authorities and local authorities named less frequently. This near-unanimous call for a greater role for specialised civil society organisations, set against their current marginal or informal involvement in most Member States, is one of the clearest and most consistent messages to emerge from the consultation.

FIGURE 5
ACTORS RESPONDENTS WANT TO SEE PLAY A GREATER ROLE IN IMPLEMENTING THE PACT ON MIGRATION AND ASYLUM



Actors questionnaire respondents want to see play a greater role in implementing the Pact on Migration and Asylum (multiple selections possible, n=16).

Number of respondents selecting this actor (out of 16) **16**

5. BARRIERS TO PROTECTION AND ACCESS TO SERVICES IDENTIFIED THROUGH REACH

Across the four national contexts, REACH partners converged on a consistent set of barriers preventing survivors of trafficking and gender-based violence from accessing protection and specialised services, alongside a set of practices (piloted or reinforced through the project) that partners consider effective and worth institutionalising or scaling up.

5.1 INFORMATION, LANGUAGE AND TRUST BARRIERS

All four partners identified a lack of information as a fundamental barrier: survivors frequently do not know their rights, are unaware that specialised services exist, or receive information only in a language they do not master. VIJ/FIZ and MIST both pointed to an acute shortage of trained interpreters and cultural mediators, particularly within reception and refugee systems, and to the physical and psychological toll of navigating overstretched services: long queues in insecure environments, in particular, were described as deterring traumatised women from seeking help at all. Layered on top of this is a deep mistrust

of authorities, rooted in survivors' experiences of authoritarian or corrupt institutions in countries of origin, manipulation within their own communities, and, as BeFree emphasised, a well-founded fear that disclosure could expose them to further retaliation by traffickers or endanger family members, notwithstanding the non-punishment principle in EU law. MIST additionally highlighted the near-total absence of adequate mental health and psychological support for migrant survivors in France, and insufficient trauma-informed training among reception-centre staff and social workers.

5.2 THE ABSENCE OF A FIREWALL BETWEEN MIGRATION CONTROL AND PROTECTION

FSA was particularly emphatic on this point: the lack of a clear separation between immigration enforcement and access to protection remains a major barrier, especially for migrants in an irregular situation who fear sanctions if they come forward. Compounding this, survivors are often asked to provide detailed information about their

traffickers from the very first contact, a practice that can undermine trust and shift the focus away from a survivor's immediate needs and rights, in tension with the "social path" approach to identification foreseen in EU law, which is meant to guarantee assistance irrespective of a victim's willingness or ability to act as a witness.

5.3 FRAGMENTED, UNEQUAL AND PRECARIOUSLY FUNDED SERVICES

FSA reported that in Spain specialised services are reliably guaranteed mainly for women trafficked for sexual exploitation, while support for other victims (including men, children, and those exploited for labour) remains insufficient, unstable and frequently project-based. Across the consortium, partners described short-term, annual project funding as structurally undermi-

ning continuity of care, at precisely the moment survivors need stable, long-term relationships to rebuild their lives. BeFree linked this directly to a broader political choice to keep the most vulnerable at the margins by constraining rights and resources, making both the emergence of exploitation and effective access to services harder to achieve.

5.4 COORDINATION GAPS BETWEEN SPECIALISED ORGANISATIONS AND PUBLIC AUTHORITIES

Coordination has improved in recent years, according to BeFree, but significant gaps remain: specialised organisations are often involved too late, once key procedural decisions have already been taken; the strength of cooperation still depends heavily on personal relationships between individual practitioners rather than on institutionalised procedures, and varies considerably between regions within the same country; and a persistent difference in professional culture (between anti-trafficking services oriented toward protection and person-centred support, and public administrations oriented primarily toward migration control or prosecution) continues

to complicate case management. FSA pointed to a related structural issue in Spain, where the absence of any single coordinating authority for detection, identification and case management, combined with overlapping mandates between the Policía Nacional and the Guardia Civil, leaves specialised NGOs to informally mediate between agencies. MIST, in France, described an even more basic obstacle: public authorities' reluctance to collaborate at all, including absence from joint trainings, driven by differing political and financial agendas, and internal gaps between frontline staff and higher-level decision-makers within the same institutions.

5.5 BARRIERS WITHIN ASYLUM AND RECEPTION SYSTEMS

VIJ/FIZ, drawing on their experience supporting survivors within the German asylum system, underscored how the Dublin Regulation's transfer mechanism creates acute risks for trafficking survivors and potential victims: relocation to another Member State can sever an established relationship of trust with a support organisation just as recovery is beginning. REACH's own

direct international contacts between partner organisations (allowing case information and trust-building introductions to be shared ahead of a survivor's relocation to Spain or Italy) were repeatedly cited by VIJ/FIZ as one of the project's most valuable, if still informal, achievements, precisely because they help maintain continuity of care across a Dublin transfer.

5.6 PROMISING PRACTICES EMERGING FROM REACH

Alongside these barriers, partners pointed to a number of concrete practices, developed or reinforced through REACH, that they consider ready for wider institutionalisation:

Survivor participation from the earliest stages of design,

through focus groups, discussion groups and structured feedback, which all four partners identified as essential to building tools and services that are genuinely accessible and trusted, rather than designed “for” survivors without their input.

MIST's survivor-led helpline pilot in France,

developed specifically to reach the target group beyond office hours and beyond the practitioner-only, French-language reach of the pre-existing hotline, combining information, referral and legal complaint collection.

Transnational study visits and direct partner-to-partner contacts,

which have not only supported mutual learning on national good practices (such as embassy/consulate cooperation, airport referral procedures, and peer education) but have also built a working network directly usable for cross-border referral in individual cases.

Systematic access for specialised anti-trafficking organisations to closed environments, airports and, in some cases, detention centres,

Peer-to-peer survivor multiplier models,

such as VIJ/FIZ's programme training survivors of trafficking in stages, covering asylum procedures, trauma and gender-based violence, to become multipliers who support new clients, participate in outreach and contribute to public advocacy, accelerating trust-building in ways that formal service provision alone cannot.

Digital, low-threshold outreach,

including the AinoAid™ chatbot and increased use of social media platforms such as TikTok, where many survivors already look for information, as a way of reaching people who would not otherwise approach a service in person, and of countering misinformation online.

Italy's Article 18 model,

which separates the right to protection from an obligation to cooperate with judicial authorities, an approach BeFree considers foundational and worth mainstreaming across Member States as the “social path” to identification is reinforced under the revised Directive.

as piloted in Spain (the Madrid–Barajas referral procedure), which FSA identified as a good practice with clear relevance for how vulnerability assessments could be organised under the Pact on Migration and Asylum.

6. POLICY RECOMMENDATIONS

The following recommendations draw directly on the evidence and reflections gathered through interviews with FSA, BeFree, MIST and VIJ/FIZ, together with the 16-response consultation questionnaire, and read against the current state of implementation of the revised Anti-Trafficking Directive, the GBV Directive, and the Pact on Migration and Asylum. They are organised by primary addressee (the European Commission; EU Member States; and both jointly), reflecting where responsibility for the underlying change principally lies.

A number of these recommendations are already reflected, at least partially, in the existing legal framework, but require more rigorous, resourced or harmonised implementation; others call for further EU or national-level policy development. Across all of them, the central thread is the same: strengthening early identification, safe referral, and survivors' timely and unconditional access to protection, whatever their migration status, nationality or the stage their asylum or criminal proceedings have reached.

The recommendations are addressed to different levels of governance depending on where responsibility for change lies. Some are already reflected, at least in part, in the existing EU legal framework, but are not yet fully or consistently implemented by national governments; these need to be applied more rigorously, monitored more closely, or made binding where currently discretionary. Others require further political will, resourcing or legislative clarification to

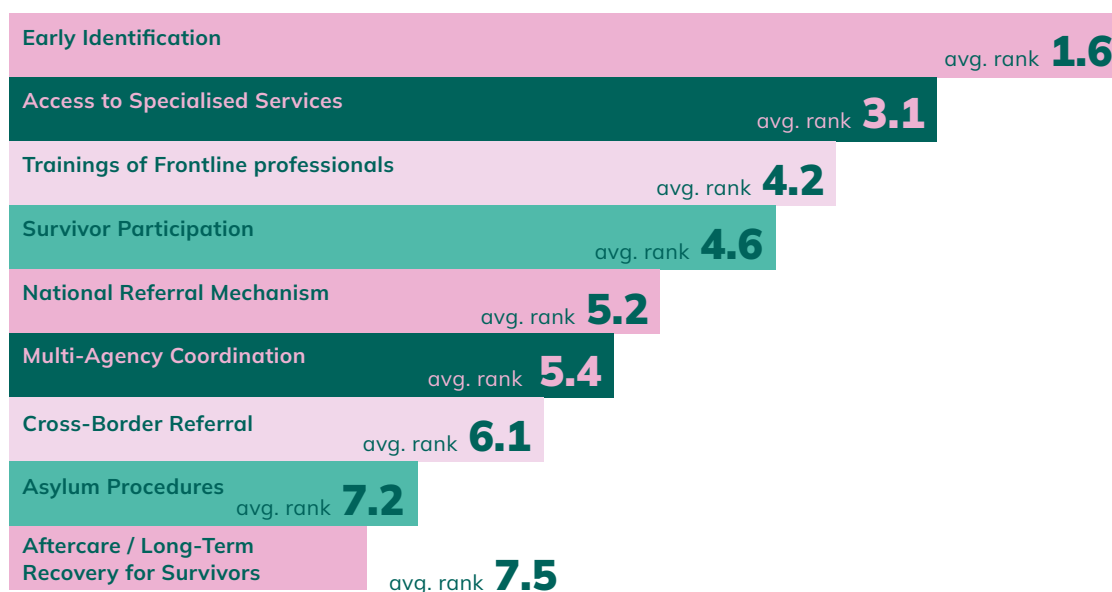
become a reality. Throughout, the recommendations centre on strengthening early identification, safe referral, and survivors' unconditional access to protection and support, the areas where the REACH partners identified the most persistent and consequential gaps.

This priority order is echoed in the questionnaire's ranking of policy action areas: early identification stands out as by far the most urgent, ahead of access to specialised services, training of frontline professionals and survivor participation, with the National Referral Mechanism, multi-agency coordination and cross-border referral following closely behind. Asylum procedures and aftercare/long-term recovery, while still recognised as important, were ranked as comparatively less urgent than the earlier stages of identification and referral, reinforcing the view that intervening as early as possible in a survivor's contact with the system is where policy attention is most needed.

Policy action areas ranked by urgency by questionnaire respondents (average rank, n=16; longer bar = higher priority).

FIGURE 6

POLICY ACTION AREAS RANKED BY URGENCY (N=16)



Priority score (higher = ranked more urgent by respondents)

6.1 RECOMMENDATIONS TO THE EUROPEAN COMMISSION

FSA reported that in Spain specialised services are reliably guaranteed mainly for women trafficked for sexual exploitation, while support for other victims (including men, children, and those exploited for labour) remains insufficient, unstable and frequently project-based. Across the consortium, partners described short-term, annual project funding as structurally undermi-

ning continuity of care, at precisely the moment survivors need stable, long-term relationships to rebuild their lives. BeFree linked this directly to a broader political choice to keep the most vulnerable at the margins by constraining rights and resources, making both the emergence of exploitation and effective access to services harder to achieve.

1. CLOSELY MONITOR AND SUPPORT THE TRANSPOSITION OF THE REVISED ANTI-TRAFFICKING DIRECTIVE

- > WHAT** The European Commission should closely monitor Member States' transposition of Directive (EU) 2024/1712 following the expiry of the 15 July 2026 deadline, provide technical guidance where needed, and carry out conformity checks to ensure that national laws fully reflect the Directive's substance. Where transposition is missing, incomplete or incorrect, the Commission should consider launching infringement proceedings. Particular attention should be paid to the non-punishment principle, the role of the national anti-trafficking coordinator, and the criminalisation of the knowing use of services provided by trafficking victims. Member States should also take into account the expertise of specialised anti-trafficking NGOs during transposition and implementation.
- > WHY** REACH partners in Spain and France reported that transposition has not been completed, or has stalled pending broader national legislative processes, and that considerable uncertainty remains about how key provisions will be implemented. Without close EU-level monitoring and guidance, the risk is that a Directive designed to raise and harmonise minimum standards produces yet another layer of fragmentation across Member States.

2. EMBED A BINDING ROLE FOR SPECIALISED ORGANISATIONS IN THE IMPLEMENTATION OF THE PACT ON MIGRATION AND ASYLUM

- > WHAT** The European Commission should issue clear implementing guidance requiring that vulnerability assessments and screening procedures under the Pact on Migration and Asylum involve specialised anti-trafficking and gender-based violence organisations from the earliest stages, rather than relying solely on law enforcement or general migration officials, in order to ensure that presumed victims of trafficking are not channeled into accelerated border procedures. The guidance should clarify that, in line with Article 20 of the Asylum Procedure Regulation (EU) 2024/1348, survivors of trafficking should generally be considered among those applicants whose support needs cannot be adequately addressed within accelerated or border procedures, given the close links between trafficking and gender-based violence. It should also draw on existing good practice, such as the Spanish model granting specialised organisations systematic access to airports and reception facilities, and set minimum standards for trafficking-specific training for all professionals conducting vulnerability assessments.
- > WHY** Partners across the consortium expressed serious concern that, as currently implemented, vulnerability screening under the Pact risks being conducted by personnel without specialised trafficking training, within timeframes too short to allow disclosure, and with insufficient clarity on whether indicators of trafficking will be read as signs of exploitation or simply as grounds for accelerated border procedures. Without a binding role for specialised organisations, the Pact risks reducing rather than improving the identification of trafficking and GBV survivors.

3. ESTABLISH A FORMAL EU-LEVEL TRANSNATIONAL REFERRAL AND CROSS-BORDER COOPERATION MECHANISM

- > WHAT** The European Commission should facilitate cooperation between the national focal points and National Referral Mechanisms that Member States are required to establish under Articles 11(4) and 11(5) of Directive (EU) 2024/1712, including through a secure and victim-centred framework for cross-border referrals and information exchange. Particular emphasis should be placed on data protection, confidentiality and safeguards against the misuse of personal data for migration control purposes. The Commission should also support sustainable funding for specialised organisations involved in cross-border case management, risk assessment and continuity of care whenever a presumed or identified victim moves between Member States, including under the Dublin system.
- > WHY** REACH partners identified direct, partner-to-partner contacts between specialised organisations across Member States as one of the project's most valuable outcomes, precisely because they allow trust-building and case continuity ahead of a survivor's relocation. However, this cooperation currently depends on informal relationships built through time-limited EU-funded projects, rather than on a durable, formally resourced mechanism, leaving survivors moving between countries at risk of losing access to protection and support.

4. PROMOTE STABLE, STRUCTURAL EU FUNDING FOR SPECIALISED ANTI-TRAFFICKING AND GBV SERVICES

- > WHAT** The European Commission should make multi-annual operating grants the default, away from short-term, annual project funding towards stable, multi-annual funding streams for specialised anti-trafficking and gender-based-violence service providers, drawing on CERV and other relevant EU funding instruments, to guarantee continuity of trauma-informed, low-threshold assistance for all victims (including those, such as men, children and labour-exploitation victims, currently underserved in some Member States).
- > WHY** Partners described current service provision, particularly outside sexual exploitation of women, as unstable and heavily dependent on short, project-based funding cycles, undermining the continuity of care survivors need to rebuild their lives. This precarity was described as a direct consequence of political and budgetary choices rather than of a lack of expertise or willingness among specialised organisations.

5. ENSURE COHERENT, JOINED-UP IMPLEMENTATION OF THE ANTI-TRAFFICKING DIRECTIVE AND THE GBV DIRECTIVE

- > WHAT** The European Commission should issue joint implementation guidance linking the revised Anti-Trafficking Directive and the GBV Directive, in particular on trauma-informed assistance, individual needs assessment, and the criminalisation of technology-facilitated violence and exploitation, to ensure the two instruments reinforce rather than duplicate or bypass one another.
- > WHY** REACH partners consistently described trafficking as part of a broader continuum of gender-based violence, and identified the current separation between anti-trafficking and anti-violence legal and service systems as a structural barrier to protection. The GBV Directive's provisions on digital violence were highlighted as a concrete opportunity to also address the use of digital platforms by traffickers for recruitment, control and advertising, an area partners consider inadequately covered by either instrument in isolation.

6.2 RECOMMENDATIONS TO THE EU MEMBER STATES

1. FORMALLY ESTABLISH AND ADEQUATELY RESOURCE NATIONAL REFERRAL MECHANISMS WITH EARLY INVOLVEMENT OF SPECIALISED ORGANISATIONS

- > WHAT** Member States that have not yet done so should formally establish National Referral Mechanisms through binding laws, regulations or administrative provisions, in line with Articles 11(4) and 11(5) of Directive (EU) 2024/1712. These mechanisms should ensure that the identification of presumed victims does not rely on law enforcement alone, but involves specialised anti-trafficking and gender-based violence organisations from the earliest possible stage, alongside a clearly designated coordinating authority, and is supported by adequate and sustainable resources. Any information shared for referral and protection purposes should be subject to strict safeguards and must not be used for immigration enforcement, in order to maintain trust, protect victims' rights and ensure a victim-centred approach.
- > WHY** France's national referral mechanism, though foreseen in its national plan, has not yet been launched. Spain lacks a single coordinating authority for detection, identification and case management. Italy reports persistent territorial disparities in how referral cooperation functions in practice. In all three cases, partners identified the absence of a fully resourced, formally established mechanism, rather than any lack of political commitment on paper, as the main obstacle to timely identification and protection.

2. GRANT SPECIALISED ORGANISATIONS SYSTEMATIC ACCESS TO RECEPTION CENTRES, DETENTION FACILITIES AND BORDER POINTS

- > WHAT** Member States should replicate and scale up practices such as Spain's Madrid-Barajas referral procedure, granting specialised anti-trafficking and gender-based violence organisations systematic access to airports, detention facilities and reception centres in order to confidentially identify and refer presumed victims, independently of formal identification by law enforcement. Public authorities should have a corresponding obligation to promptly notify and facilitate access for specialised organisations whenever indicators of trafficking are identified, rather than requiring such organisations to discover cases themselves. Any information shared for referral purposes should be subject to strict confidentiality safeguards and must not be transferred to, or used for, immigration enforcement purposes.
- > WHY** Where specialised organisations already have this access, partners described faster, safer identification and referral. Where they do not, identification depends entirely on the trafficking awareness of law-enforcement or reception staff who may lack specialised training, a gap partners consider especially urgent to close as the Pact on Migration and Asylum introduces new, faster screening procedures at the border.

3. ENSURE VULNERABILITY ASSESSMENTS UNDER THE PACT ARE CONDUCTED WITH TRAINED, SPECIALISED INPUT

- > WHAT** Member States should ensure that vulnerability assessments and screening procedures under the Pact on Migration and Asylum are carried out or co-conducted by professionals with dedicated, systematic training on human trafficking and gender-based violence indicators at minimum, going beyond general briefings, and that independent, specialised organisations, rather than law-enforcement personnel alone, are formally part of this process.
- > WHY** Partners in Spain and France both reported significant uncertainty as to whether professionals conducting vulnerability assessments will receive trafficking-specific training, and raised concerns that assessments led primarily by law-enforcement or migration officials risk detecting only the most visible vulnerabilities during an initial, time-limited triage.

4. GUARANTEE GENUINE, ACCESSIBLE RECOVERY AND REFLECTION PERIODS REGARDLESS OF MIGRATION PROCEDURE

- > WHAT** Member States should ensure that the recovery and reflection period of 90 days foreseen for (presumed) victims of trafficking is genuinely accessible in practice, including for individuals in the asylum system and for those facing a Dublin transfer, rather than being curtailed by accelerated border or return procedures.
- > WHY** Partners identified the recovery and reflection period as a valuable protective tool, but one whose practical accessibility varies significantly across Member States and risks being undermined by the accelerated timelines introduced under the Pact on Migration and Asylum.

5. PROVIDE STABLE, STRUCTURAL FUNDING TO SPECIALISED SERVICE PROVIDERS

- > WHAT** Member States should move away from annual, project-based funding of specialised anti-trafficking and GBV organisations towards multi-annual, structural funding arrangements sufficient to guarantee continuity of trauma-informed, low-threshold assistance to all categories of victims, including men, children and victims of labour exploitation.
- > WHY** In several Member States covered by REACH, comprehensive services remain reliably available mainly for women trafficked for sexual exploitation, while support for other victims is described as unstable, inconsistent and dependent on short-term project funding, undermining both service continuity and the sustainability of specialised expertise.

6. INSTITUTIONALISE MEANINGFUL SURVIVOR PARTICIPATION IN SERVICE DESIGN, DELIVERY AND POLICY

- > **WHAT** Member States should support the institutionalisation of survivor participation models, such as peer-to-peer survivor multiplier programmes and survivor-led helplines, including through appropriate training, safeguarding, recognition of survivors' expertise and, where legally possible, fair remuneration. Particular attention should be paid to removing practical and legal barriers that prevent survivors with insecure or irregular status from being employed or compensated for their contributions, ensuring that participation is meaningful, sustainable and extends beyond one-off testimonial contributions.
- > **WHY** REACH partners identified survivor participation, from project design through to service delivery and advocacy, as one of the project's clearest successes and one of its most important lessons for future policy. Peer-to-peer models were reported to accelerate trust-building with new clients in ways formal services alone cannot achieve, but currently depend on individual project funding rather than durable institutional support.

7. ENSURE CONTINUOUS, MANDATORY AND MULTIDISCIPLINARY TRAINING FOR ALL FRONTLINE PERSONNEL, CO-DEVELOPED WITH SPECIALISED NGOS AND SURVIVORS

- > **WHAT** Member States should require ongoing, mandatory training on human trafficking and gender-based-violence indicators, safe referral procedures, and trauma-informed, gender-sensitive practice for all personnel likely to come into contact with (presumed) victims (including border and reception staff, social workers, health professionals and law enforcement) and should ensure that this training reaches, and is regularly refreshed for, staff in high-turnover roles.
- > **WHY** Across all four countries, partners identified insufficient and inconsistent training, and high staff turnover among public authorities, as a persistent cause of inconsistent recognition and protection of victims' rights, and as a factor undermining trust and continuity of case management.

8. GUARANTEE ADEQUATE NUMBERS OF QUALIFIED INTERPRETERS AND CULTURAL MEDIATORS

- > **WHAT** Member States should invest in training and retaining sufficient numbers of qualified interpreters and cultural mediators across the referral chain, from first reception through to specialised assistance, to address the language and information barriers repeatedly identified as a primary obstacle to disclosure and access to services. Safeguards should be put in place to minimise the risk of coercion, intimidation or manipulation within survivors' communities, including appropriate vetting and training of interpreters and cultural mediators, the possibility for victims to decline a particular interpreter or mediator, and, where appropriate and requested, gender-matching arrangements.
- > **WHY** Partners in Germany and France in particular identified a shortage of trained translators and cultural mediators, alongside a broader lack of accessible information in survivors' own languages, as a fundamental barrier preventing survivors from understanding their rights or the services available to them.

6.3 RECOMMENDATIONS TO THE EU MEMBER STATES AND EUROPEAN COMMISSION

1. ESTABLISH A CLEAR FIREWALL BETWEEN MIGRATION ENFORCEMENT AND VICTIM PROTECTION

- > WHAT** The European Commission and Member States should ensure a clear, effective separation, a “firewall”, between immigration enforcement and victims' access to protection, guaranteeing unconditional assistance to (presumed) victims of trafficking regardless of migration status, nationality, or willingness or ability to cooperate with judicial or law-enforcement authorities.
- > WHY** Partners identified the absence of such a firewall as a major deterrent to disclosure, particularly for migrants in an irregular situation who fear that seeking help will expose them to immigration sanctions rather than protection, undermining both individual protection outcomes and the wider fight against trafficking networks that rely on this fear.

2. INTEGRATE ANTI-TRAFFICKING AND GENDER-BASED-VIOLENCE SYSTEMS AND SERVICES

- > WHAT** The European Commission and Member States should promote stronger coordination between anti-trafficking, gender-based violence, health, social protection and asylum systems, including through shared trauma-informed approaches and joint referral and cooperation protocols. While recognising the significant overlap between trafficking and gender-based violence, particularly for women and girls, such efforts should reflect the diverse forms of trafficking and ensure that responses are tailored to the specific needs and experiences of all victims.
- > WHY** REACH partners, notably BeFree, described the historical separation between anti-trafficking and anti-violence systems as failing to reflect the lived reality of many survivors, who require an integrated response rather than being forced to fit their experience into one administrative category or the other.

3. REBALANCE THE CRIMINAL-JUSTICE-CENTRED APPROACH TOWARDS A RIGHTS-BASED, VICTIM-CENTRED ONE

- > WHAT** The European Commission and Member States should ensure that protection of (presumed) victims is treated as an autonomous priority, not conditioned on cooperation with criminal proceedings or on the outcome of prosecutions, and should mainstream approaches, such as Italy's Article 18 model, that separate the right to protection from any obligation to testify against exploiters.
- > WHY** Several partners, in particular BeFree, argued that investigative and prosecutorial priorities too often take precedence over survivors' protection needs in practice, delaying identification, restricting access to services, or making protection conditional on cooperation with authorities, despite the EU's stated human-rights-based approach to trafficking.

4. INVEST IN SAFE DIGITAL TOOLS AND INDEPENDENT MONITORING OF BORDER AND ASYLUM PROCEDURES

- > WHAT** The European Commission and Member States should continue to invest in digital, low-threshold outreach tools (such as multilingual chatbots, online helplines and social media engagement) as first points of contact for survivors, with appropriate data protection and informed-consent safeguards, while also establishing independent monitoring of border and asylum procedures under the Pact on Migration and Asylum to detect under-identification, discrimination, or the automatic channelling of trafficking indicators into accelerated procedures.
- > WHY** REACH's own experience with the AinoAid™ chatbot and increased social media outreach demonstrated the value of digital channels in reaching survivors who might not otherwise approach a service. At the same time, partners raised serious concerns that the speed of new border and screening procedures under the Pact could increase both under-identification and the risk of discriminatory treatment of survivors, making independent oversight essential.

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