

FOURTH EVALUATION ROUND

Measures to prevent and detect vulnerabilities
to human trafficking

EVALUATION REPORT BOSNIA AND HERZEGOVINA

GRETA

Group of Experts
on Action against
Trafficking in Human Beings



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in Human Beings

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Preamble

In accordance with Article 38, paragraph 1, of the Convention on Action against Trafficking in Human Beings (“the Convention”), GRETA evaluates the implementation of the Convention following a procedure divided into rounds. At the beginning of each round, GRETA selects the specific provisions on which the evaluation procedure is based.

The first round of monitoring of the Convention provided an overview of its implementation by States Parties. The second evaluation round examined the impact of legislative, policy and practical measures on the prevention of trafficking in human beings (THB), the protection of the rights of victims, and the prosecution of traffickers, paying particular attention to measures taken to address new trends in human trafficking, in particular trafficking for the purpose of labour exploitation, and child trafficking. The third evaluation round focused on trafficking victims’ access to justice and effective remedies.

For the fourth evaluation round of the Convention, GRETA has decided to focus on vulnerabilities to human trafficking and measures taken by States Parties to prevent them, detect and support vulnerable victims, and punish the offenders. An additional focus concerns the use of information and communication technology (ICT) to commit human trafficking offences, which brings structural changes to the way offenders operate and exacerbates existing vulnerabilities.

A number of provisions of the Convention establishing substantive and procedural obligations are relevant to this topic. The concept of “vulnerability” appears in Articles 4 (definitions), 5 (prevention of trafficking in human beings) and 12 (assistance to victims) of the Convention. According to paragraph 83 of the Explanatory report to the Convention, “by abuse of a position of vulnerability is meant abuse of any situation in which the person involved has no real and acceptable alternative to submitting to the abuse. The vulnerability may be of any kind, whether physical, psychological, emotional, family-related, social or economic. The situation might, for example, involve insecurity or illegality of the victim’s administrative status, economic dependence or fragile health. In short, the situation can be any state of hardship in which a human being is impelled to accept being exploited. Persons abusing such a situation flagrantly infringe human rights and violate human dignity and integrity, which no one can validly renounce.”

GRETA refers to the ICAT Issue Brief No. 12/2022 on Addressing vulnerability to trafficking in persons which refers to vulnerability as “those inherent, environmental or contextual factors that increase the susceptibility of an individual or group to being trafficked”. It classifies vulnerability factors in three categories: personal (e.g. age, gender, ethnicity, disability), situational (e.g. destitution, unemployment, legal status) and contextual (e.g. discriminatory laws, policies and social norms, armed conflicts, crises) factors, which interact and may increase the risk of human trafficking for certain individuals, groups and/or communities.¹ Vulnerability to human trafficking is also subject to intersectional factors, such as gender, belonging to a minority group and socio-economic status.

In addition to the thematic focus on vulnerabilities to human trafficking, GRETA has decided that each State Party will receive country-specific follow-up questions related to recommendations not implemented or partially implemented after the third evaluation round.

GRETA recalls that it has adopted the use of three different verbs - “urge”, “consider”, and “invite” – which correspond to different levels of urgency for bringing the State Party’s legislation and/or practice into compliance with the Convention. Thus, GRETA uses the verb “urge” when it assesses that the national legislation or policies are not in compliance with the Convention or when it finds that, despite the existence of legal provisions and other measures, the implementation of a key obligation of the Convention is lacking. In other situations, GRETA “considers” that it is necessary to make further improvements to fully comply with an obligation of the Convention. By “inviting” a country to pursue its efforts, GRETA acknowledges that the authorities are already on the right track and encourages them to continue existing action.

¹ [ICAT Issue Brief No. 12 on Addressing vulnerability to trafficking in persons - Search \(bing.com\)](#)

Executive summary

This report, covering the period from 2022 to March 2026, evaluates the measures taken by Bosnia and Herzegovina to prevent vulnerabilities to trafficking in human beings (THB), detect and support vulnerable victims, and punish the offenders. In doing so, it pays particular attention to the use of information and communication technology (ICT) to commit human trafficking offences, as well as to the use of technological innovations to prevent THB, protect victims and prosecute traffickers. The report also evaluates progress made in selected areas examined by GRETA during previous evaluation rounds.

During the reporting period, amendments were made to the Criminal Code of the Brčko District with a view to strengthening the legal framework for combating THB and enhancing victim protection. The institutional framework for anti-trafficking action has remained unchanged. In October 2024, the Council of Ministers of Bosnia and Herzegovina adopted a Strategy for Combating Trafficking in Human Beings for the period 2024-2027. Further, in October 2025, the Council of Ministers adopted an Action Plan for state institutions for the implementation of the Anti-Trafficking Strategy.

Bosnia and Herzegovina remains a country of origin, destination and transit for victims of THB. The total number of victims identified during the period 2022-2025 was 177, of whom approximately three quarters were children. Forced begging remained the predominant form of exploitation, followed by labour exploitation and sexual exploitation. As regards emerging trends in THB, the report notes an increase in the proportion of child victims compared with the previous reporting period. Another notable trend is the increased use of ICT by traffickers for the recruitment, exploitation and control of victims.

Members of the Roma community, particularly women and children, remain among the groups most vulnerable to THB in Bosnia and Herzegovina, notably for the purpose of forced begging and forced marriage. Migrants and asylum seekers, including unaccompanied children, are also exposed to trafficking risks, while the growing demand for foreign workers in sectors such as construction, agriculture and hospitality has increased vulnerabilities to labour exploitation.

GRETA welcomes the steps taken in Bosnia and Herzegovina to prevent the trafficking of children and young people. These include training for the police, prosecutors, judicial officers, teachers and other professionals working with children, awareness-raising campaigns among students and parents, and initiatives promoting digital literacy and online safety. Nevertheless, GRETA notes that awareness-raising activities in this area largely depend on civil society initiatives funded almost exclusively by international donors. The report also highlights the vulnerability of children in institutional care and the insufficient support for young people leaving such institutions at the age of 18, as well as the lack of a comprehensive strategy for the de-institutionalisation of childcare. GRETA urges the authorities to provide adequate financial support to day-care centres for children in street situations and to increase accommodation facilities for the emergency protection of children at risk of exploitation. GRETA also considers that the authorities should continue raising awareness of the risks of THB among children, parents and other caregivers, with a particular focus on online methods of recruitment, and further strengthen the role of the education system in preventing child trafficking.

GRETA welcomes the measures taken to address the vulnerability of Roma children to THB through educational campaigns and efforts to prevent school drop-out. While trafficking among Roma children for the purpose of forced begging appears to have decreased, child marriage remains a major concern. GRETA urges the authorities to strengthen efforts to prevent child marriage, including through programmes empowering Roma girls, training professionals working with Roma children and engaging local communities. The report also stresses the need to address poverty and social exclusion among Roma, which remain important root causes of THB.

Against the backdrop of a growing demand for migrant workers in Bosnia and Herzegovina, the report highlights challenges in detecting cases of THB by labour inspectors, including inadequate staff resources and limited training. While welcoming awareness-raising activities and capacity-building efforts undertaken during the reporting period, GRETA urges the authorities to provide labour inspectorates with sufficient staff and resources and to strengthen the outreach work of labour inspectors, law enforcement officials and other relevant actors with a view to identifying victims of THB for the purpose of labour exploitation.

Asylum seekers, migrants in an irregular situation and unaccompanied or separated migrant children are also vulnerable to THB. While recognising the challenges arising from Bosnia and Herzegovina's situation as a transit country for migrants travelling towards EU member states, GRETA urges the authorities to reinforce screening procedures and vulnerability assessments with a view to improving the detection of victims of THB among migrants and asylum seekers. In this connection, the human and financial resources of centres for social work should be increased in order to ensure that unaccompanied and separated children receive effective protection through legal guardianship.

In addition, GRETA considers that further efforts are needed to reduce vulnerabilities related to the gender dimension of THB, including through awareness raising and training aimed at eliminating sexual and gender-based violence. The report also contains recommendations to address the vulnerabilities of persons with disabilities and LGBTI persons to human trafficking.

There have been no changes to the procedure for the identification of victims of THB in Bosnia and Herzegovina. In order to encourage victims of THB to report their situation to the authorities, a secure web application was launched in February 2024. Further, the Ministry of Security, with the support of IOM, developed an interactive mobile application with key indicators of different forms of THB, which has been disseminated to the relevant frontline officials. While welcoming the proactive work of the mobile identification teams and the provision of guidance and training to relevant professionals, GRETA urges the authorities to put in place a procedure for the identification of victims of trafficking among asylum seekers and migrants in an irregular situation, including unaccompanied or separated children, and facilitate the involvement of specialised NGOs in the identification of victims of trafficking.

Assistance to victims of THB is provided in co-operation with specialised NGOs operating shelters that accommodate both victims of domestic violence and victims of trafficking. Despite a recent increase in public funding, victim assistance services remain largely dependent on external donor funding. The closure in January 2024 of the country's largest shelter for victims of trafficking due to a lack of funds has significantly reduced accommodation capacity, particularly for child victims. GRETA urges the authorities to ensure adequate and sustainable funding for victim assistance, establish specialised safe houses for child victims and develop victim-centred and age-appropriate programmes for long-term support and integration of victims of THB.

Furthermore, GRETA considers that the authorities of Bosnia and Herzegovina should ensure that the abuse of a victim's position of vulnerability is properly acknowledged in criminal cases related to trafficking. For this purpose, relevant professionals should be provided with training and guidance on how victims' position of vulnerability may exist or arise and how its abuse may operate in the context of trafficking.

GRETA welcomes the increase in the number of convictions for THB compared with the previous reporting period, as well as the issuance by the High Judicial and Prosecutorial Council of Bosnia and Herzegovina of Guidelines for the judicial procedure in human trafficking cases, which cover victim compensation, access to free legal aid and the non-punishment provision. However, the report notes that human trafficking cases are sometimes prosecuted as lesser offences. GRETA considers that further efforts are needed to strengthen the criminal justice response to THB, including by providing sufficient human and financial resources to the police, making use of special investigation techniques to gather evidence, and ensuring that trafficking offences are prosecuted as such and lead to proportionate and dissuasive sanctions.

The report highlights the increasing role of social media in the recruitment of victims of trafficking, with traffickers using fake job offers, grooming and other online schemes to target vulnerable persons, particularly children and young people. Several of the country's police agencies have established cyber units to monitor online activity and support the investigation of technology-facilitated trafficking offences. While awareness-raising initiatives on online safety and digital risks have been undertaken, GRETA considers that further action is needed to combat ICT-facilitated trafficking in human beings, including through capacity building and investment in digital tools to conduct proactive investigations.

The report further examines two follow-up topics from previous evaluation rounds: victims' access to legal assistance and free legal aid, and compensation for victims of THB.

While welcoming the efforts made to improve access to legal assistance and free legal aid for victims of trafficking, GRETA urges the authorities to ensure that legal assistance is provided systematically and as soon as there are reasonable grounds for believing that a person is a victim of trafficking. The authorities should also secure adequate funding for centres for legal aid and NGOs providing free legal aid to victims.

GRETA remains concerned by the limited number of victims of THB who obtain compensation and the continued absence of a state compensation scheme for victims of trafficking. Consequently, GRETA urges the authorities to ensure that the collection of evidence about the harm the victim has suffered is part of the criminal investigation, make full use of the legislation on the seizure and confiscation of assets to secure compensation, and establish without further delay a state compensation scheme accessible to all victims of THB.

**General information on trafficking in human beings
in Bosnia and Herzegovina**
(covering the period from 2022 until March 2026)

Entry into force of the Council of Europe Convention on Action against Trafficking in Human Beings Previous evaluations by GRETA	1 May 2008 • First evaluation report (published on 14 May 2013) • Second evaluation report (published on 17 July 2017) • Third evaluation report (published on 28 June 2022)
Co-ordination of action against trafficking in human beings (THB)	<i>At the State level:</i> • State Co-ordinator for Combating Trafficking in Human Beings • Strike Force for Combating Trafficking in Human Beings and Organised Illegal Migration (responsible for co-ordinating the criminal justice response to THB) <i>At the level of the entities, the cantons and the Brčko District:</i> • Co-ordinators for combating trafficking in human beings • Local co-ordination/monitoring teams
National Rapporteur on THB	The position of National Rapporteur has not been established yet.
Specialised bodies	• Section for Prevention and Detection of Organised Crime, Crimes related to Trafficking in Human Beings, Drug Trafficking and Other Criminal Offences within the Criminal Investigation Department of the State Investigation and Protection Agency (SIPA) • Section for Combating Trafficking in Human Beings and Smuggling of Migrants within the Organised Crime Department of the State Prosecutor's Office
Strategy/Action Plans	• Strategy for Combating Trafficking in Human Beings in Bosnia and Herzegovina (2024-2027) and an Action Plan for its implementation • Action Plans for Combating Trafficking in Human Beings of the Republika Srpska, the Federation of Bosnia and Herzegovina, Tuzla Canton, Bosnian-Podrinje Canton, Herzegovina-Neretva Canton, Canton 10, Una-Sana Canton, Sarajevo Canton and West Herzegovina Canton
Relevant legislation	• Criminal Code of Bosnia and Herzegovina (Article 186 criminalises international trafficking in human beings) • Criminal Code of the Federation of Bosnia and Herzegovina (Articles 210a - trafficking in human beings and 210b - organised trafficking in human beings) • Criminal Code of the Republika Srpska (Article 145 – trafficking in human beings; Article 146 – trafficking in children; Article 147 – association for the purpose of committing the criminal offence of trafficking in human beings or trafficking in children) • Criminal Code of the Brčko District (Articles 207a - trafficking in human beings and 207b - trafficking in children) • Law on Foreigners • Law on Asylum • Laws on the Provision of Free Legal Aid (most cantons in the Federation of Bosnia and Herzegovina, the Republika Srpska and the Brčko District)
National Referral Mechanism (NRM)	The identification of victims of trafficking is conducted by prosecutors, the SIPA and the Service for Foreigners' Affairs. Identification is not conditional upon the opening of a criminal investigation.

Trafficking profile	Bosnia and Herzegovina is a country of origin, destination and transit for victims of THB. Some 75% of the identified victims were children (mostly girls). Forced begging was the predominant form of exploitation, followed by labour and sexual exploitation. The majority of the identified victims were nationals of Bosnia and Herzegovina.
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I. Introduction

1. Following the entry into force of the Council of Europe Convention on Action against Trafficking in Human Beings (“the Convention”) in respect of Bosnia and Herzegovina on 1 May 2008, the authorities have taken a series of steps to develop the legislative and institutional framework for action against trafficking in human beings. This includes amending the definition of THB in the criminal legislation at the state and entity levels² to align it with the Convention and introducing victims’ rights to a recovery and reflection period and a residence permit under the Law on Foreigners. The authorities have regularly adopted strategies and action plans for combating THB. Further, they have adopted Standard Operating Procedures for the identification of victims of trafficking and have established multidisciplinary teams for the identification and referral to assistance of victims of human trafficking. However, after three rounds of evaluation, GRETA concluded that there were continuing shortcomings in certain areas, such as the prevention and identification of trafficking for the purpose of labour exploitation, access to legal aid for presumed THB victims, victims’ access to compensation, and the criminal justice response to human trafficking.

2. On the basis of GRETA’s third report, the Committee of the Parties to the Convention adopted a recommendation to the authorities of Bosnia and Herzegovina on 17 June 2022, requesting them to inform the Committee, within a two-year period, of measures taken to comply with the recommendation. The report submitted by the authorities was considered at the 35th meeting of the Committee of the Parties (29 November 2024) and was made public.³

3. On 28 June 2024, GRETA launched the fourth round of evaluation of the Convention in respect of Bosnia and Herzegovina by sending the questionnaire for this round to the authorities. The deadline for submitting the reply to the questionnaire was 28 October 2024 and the authorities’ reply was received on 4 November 2024.

4. An evaluation visit to Bosnia and Herzegovina took place from 12 to 16 May 2025 in order to hold meetings with relevant governmental and non-governmental actors, collect additional information and examine the practical implementation of adopted measures. The visit was carried out by a delegation composed of:

- Mr Luka Maderić, 2nd Vice-President of GRETA;
- Ms Dorothea Czarnecki, member of GRETA;
- Ms Svala Ísfeld Ólafsdóttir, member of GRETA;
- Mr Elvin Aliyev, Administrator in the Secretariat of the Convention;
- Mr Mesut Bedirhanoglu, Administrator in the Secretariat of the Convention.

5. During the visit, the GRETA delegation held consultations with representatives of the State Ministries of Security, Human Rights and Refugees, Justice, and Foreign Affairs, law enforcement agencies, the Prosecutor’s Office and the Court of Bosnia and Herzegovina. Further, the delegation met with relevant ministries and agencies in the Federation of Bosnia and Herzegovina, the Republika Srpska and the Brčko District, including representatives of law enforcement, prosecution and judicial authorities, legal aid centres, labour inspectorates, and social and child protection services. Meetings were also held with local co-ordination teams for combating trafficking in human beings.

² As explained in GRETA’s previous reports, the legislative framework for combating THB in Bosnia and Herzegovina reflects the State’s organisational structure: relevant legislation, including criminal codes, exists at the level of the State, the two Entities (the Federation of Bosnia and Herzegovina and the Republika Srpska) and the Brčko District.

³ <https://rm.coe.int/report-submitted-by-the-authorities-of-bosnia-and-herzegovina-on-measu/1680b2bd6f>

6. In addition, the delegation held discussions with Human Rights Ombudspersons of Bosnia and Herzegovina and the Ombudsperson for Children in the Republika Srpska, as well as with members of the Roma Committee of the Council of Ministers of Bosnia and Herzegovina, the Council for Children and the Council for Persons with Disabilities.

7. Separate meetings were held with representatives of non-governmental organisations (NGOs) providing assistance to victims of human trafficking. The GRETA delegation also met with officials of the International Organization for Migration (IOM), the Organization for Security and Co-operation in Europe (OSCE), the United Nations High Commissioner for Refugees (UNHCR), the United Nations Children's Fund (UNICEF), the European Union Delegation in Sarajevo, and the German Agency for International Co-operation (GIZ).

8. In the course of the visit, the delegation visited a safe house for victims of domestic violence, which also accommodates victims of human trafficking, managed by the NGO Lara Foundation in Bijeljina, a safe house for unaccompanied children operated by the NGO Jesuit Refugee Service in Sarajevo, and a temporary reception centre for migrants in Blažuj.

9. The list of the public bodies, NGOs and other organisations with which the delegation held consultations is set out in Appendix 3 to this report. GRETA is grateful for the information provided by them.

10. GRETA wishes to place on record the co-operation provided by the authorities of Bosnia and Herzegovina and in particular by the contact person appointed to liaise with GRETA, Mr Sanin Prašović, Expert Advisor on Combating Trafficking in Human Beings at the State Ministry of Security.

11. The draft version of the present report was approved by GRETA at its 55th meeting (17-21 November 2025) and was submitted to the authorities of Bosnia and Herzegovina for comments. The authorities' comments were received on 9 February 2026 and were taken into account by GRETA when adopting the final report at its 56th meeting (2-6 March 2026). The report covers the situation up to 6 March 2026; developments since that date are not taken into account in the following analysis and conclusions. GRETA's conclusions and proposals for action are summarised in Appendix 2.

II. Overview of trends and changes in the legislative, institutional and policy framework for action against human trafficking

12. Bosnia and Herzegovina is a country of origin, destination and transit for victims of THB. According to the data provided by the authorities, the number of identified potential victims of trafficking⁴ was 38 in 2022, 37 in 2023, 37 in 2024, and 65 in 2025 (see Appendix 1 for a detailed breakdown).⁵ About 75% of the victims identified during the reporting period were children (mostly girls). Forced begging remained the most prevalent form of exploitation (with the exception of 2025), followed by labour exploitation and sexual exploitation. The majority of the victims were nationals of Bosnia and Herzegovina (125 out of a total of 177 potential victims). Nearly half of the identified foreign victims originated from Croatia and Türkiye.

13. As regards emerging trends, there has been an increase in the proportion of child victims of THB compared to the previous reporting period (from 62% to 77%) as well as in the number of victims of labour exploitation. Another trend is the increased use of information and communication technology (ICT) by traffickers in the recruitment, exploitation and control of victims of THB.

14. Since the third evaluation of Bosnia and Herzegovina by GRETA in 2021, the only change to the legislative framework relevant to anti-trafficking action concerns the Brčko District, where amendments were made to the Criminal Code (CC) in March 2024 with a view to strengthening the legal framework for combating THB and enhancing victim protection. In particular, trafficking offences were differentiated as trafficking of adults (Article 207a) and child trafficking (Article 207b) and the list of exploitation purposes of human trafficking was expanded to include “forced begging”, “committing criminal offences”, “forced or arranged marriage”, “forced sterilisation” and “forced pregnancy or artificial insemination”. In addition, the acts of transfer, sale, purchase, acting as an intermediary in sale, and exchange or transfer of control over a person were included in the relevant provisions.

15. The institutional framework for anti-trafficking action has remained unchanged since GRETA's last evaluation. This framework is established in accordance with the Constitution and laws of Bosnia and Herzegovina, with clearly defined competences in the area of combating THB. The activities of relevant stakeholders at the level of the state, the entities, the Brčko District and the local authorities are co-ordinated by the State Co-ordinator for Combating Trafficking in Human Beings and Illegal Migration,⁶ with the support of staff of the Department for Combating Trafficking in Human Beings at the Ministry of Security of Bosnia and Herzegovina. In addition, each entity and canton and the Brčko District have their anti-trafficking co-ordinator (usually a representative of the respective Ministry of the Interior/police authorities) who is responsible for managing the local co-ordination (or monitoring)⁷ teams and THB-related activities. As acknowledged by various interlocutors met by the GRETA delegation, the fragmented institutional framework of Bosnia and Herzegovina continues to impede efforts to combat THB and results in inconsistent standards and practices in addressing human trafficking and protecting victims' rights.

16. Local co-ordination teams operate at the level of the Federation of Bosnia and Herzegovina (one team) and its 10 cantons (one team in each canton), the Republika Srpska (six teams) and the Brčko District (one team).⁸ These multidisciplinary teams are in charge of co-ordinating the work of relevant institutions in preventing, investigating and prosecuting cases of THB and in providing assistance to

⁴ A person is given the status of a “potential victim” of human trafficking when he/she is identified as such by the relevant authority. In order for a person to be considered a victim of trafficking, a final conviction for the criminal offence of THB has to be handed down by the competent court.

⁵ During the previous reporting period (2017-2021), there were 83 victims identified in 2017, 36 in 2018, 61 in 2019, 70 in 2020, and 56 in 2021.

⁶ At the time of GRETA's visit, Mr Ermin Pešto, Assistant Minister of Security of Bosnia and Herzegovina, had just taken up the position of State Co-ordinator.

⁷ As they are officially called in the Republika Srpska.

⁸ Local co-ordination teams were established in 2020 as a result of a restructuring of the previously existing Regional Monitoring Teams, given the cumbersome structure of the latter and related operational challenges. See [GRETA's third evaluation report on Bosnia and Herzegovina](#), paragraph 17.

victims. The teams are composed of representatives of the police, prosecutors' offices, social work centres, labour inspectorates and other institutions, such as justice, health, finance and education authorities. As was the case during GRETA's third evaluation, with some exceptions (Brčko, Tuzla, Una-Sana, Zenica-Doboj and the Federation teams), representatives of NGOs were not involved in the co-ordination teams. In this regard, GRETA reiterates the importance of building strategic partnerships with specialised NGOs, which are well placed to assist the authorities in their tasks of prevention of THB and the detection and protection of victims.

17. Further, mobile identification teams have been established in order to proactively identify potential victims of human trafficking and facilitate co-ordination at the local government level. At the time of GRETA's visit, there were 11 mobile teams operating in various cities throughout the country.⁹ These teams typically comprise representatives of the police and centres for social work, while some of them also involve NGOs and Roma mediators (see paragraph 98).

18. The Strike Force for Combating Trafficking in Human Beings and Organised Illegal Migration (hereafter "Strike Force") continues to co-ordinate the criminal justice response to THB in Bosnia and Herzegovina. Established by the Council of Ministers in 2003, it brings together representatives from various judicial and law enforcement bodies, including the Prosecutor's Office of Bosnia and Herzegovina, the State Investigation and Protection Agency, the Service for Foreigners' Affairs (SFA) under the Ministry of Security, law enforcement and tax authorities from different levels of government throughout Bosnia and Herzegovina. Since 2023, labour inspectors from the Federation of Bosnia and Herzegovina, the Republika Srpska and the Brčko District have been invited to the meetings of the Strike Force in the capacity of observers. The Strike Force is chaired by the Chief Prosecutor of Bosnia and Herzegovina and meets monthly, providing a platform for exchange of information and co-ordination of the work of different agencies.

19. There is no independent National Rapporteur on THB in Bosnia and Herzegovina. In their comments on the draft GRETA report, the authorities of Bosnia and Herzegovina indicated that the State Co-ordinator for Combating Trafficking in Human Beings, as well as the co-ordinators at the entity, cantonal and Brčko District levels, monitor the activities of all institutions in line with their competences in the fight against human trafficking and that there is therefore no need to establish new structures. GRETA would like to stress that Article 29 of the Convention makes a clear distinction between National Co-ordination and National Rapporteur. The key features of National Rapporteurs' mechanisms, in the sense of Article 29, paragraph 4, of the Convention,¹⁰ should be the ability to critically monitor the efforts and effectiveness of all state institutions, including national co-ordinators, and to that end maintain a constant exchange with civil society, the research community and other relevant stakeholders. The human rights-based approach to anti-trafficking policies advocated by the Convention requires adequate monitoring and evaluation. A structural separation between monitoring and executive functions enables an objective evaluation of the implementation of anti-human trafficking legislation, policy and activities, identification of lacunae and shortcomings, and the formulation of comprehensive legal and policy recommendations. GRETA considers that the authorities of Bosnia and Herzegovina should take the necessary steps to establish an independent National Rapporteur or to designate another existing mechanism for monitoring the anti-trafficking activities of state institutions, as provided for in Article 29, paragraph 4, of the Convention.

20. On 23 October 2024, the Council of Ministers of Bosnia and Herzegovina adopted a Strategy for Combating Trafficking in Human Beings for the period 2024-2027. The Strategy aims to ensure an effective and co-ordinated response to combat THB by: (i) enhancing the relevant legal, institutional and

⁹ In Sarajevo, Banja Luka, Bihać, Bijeljina, Bosanska Krupa, Cazin, Mostar, Tuzla, Visoko, Zvornik and Živinice.

¹⁰ "Each Party shall consider appointing National Rapporteurs or other mechanisms for monitoring the anti-trafficking activities of State institutions and the implementation of national legislation requirements."

policy framework, (ii) developing mechanisms to prevent and limit the occurrence and persistence of human trafficking, including through public awareness campaigns, (iii) enhancing the detection and criminal prosecution of human trafficking offenders and related offences, (iv) improving procedures for the identification and protection of victims of THB and assistance measures for them, with a special focus on women, children and foreign nationals, and (v) strengthening international co-operation and expanding the involvement of civil society, bar associations and the private sector in the fight against human trafficking.¹¹ On 30 October 2025, the Council of Ministers of Bosnia and Herzegovina adopted an Action Plan for state institutions for the implementation of the Anti-Trafficking Strategy. Both the Strategy and the Action Plan were developed with the support of a Council of Europe project.¹²

21. As specified in the Strategy, the entity governments, cantons and the Brčko District should adopt action plans for its implementation within their respective jurisdictions. At the time of GRETA's visit, an action plan had been adopted only in the Republika Srpska, prepared with support from the Council of Europe and outlining a range of measures and activities to be undertaken in various areas. Subsequently, the Federation of Bosnia and Herzegovina, Tuzla Canton, Bosnian-Podrinje Canton, Herzegovina-Neretva Canton, Canton 10, Una-Sana Canton, Sarajevo Canton and West Herzegovina Canton also adopted anti-trafficking action plans, some of which were developed with the support of the above-mentioned Council of Europe project.

22. An evaluation of the implementation of the previous Anti-Trafficking Strategy (2020-2023), commissioned by the USAID, was conducted in August 2023.¹³ It concluded that, considering the political instability in Bosnia and Herzegovina which inevitably affected the implementation of the strategy, coupled with the scarcity of allocated budget funds for envisaged activities, most activities had been successfully implemented. In this regard, the evaluation contained specific recommendations for the preparation of the next strategy, including improving co-ordination between different levels of government, ensuring harmonisation with other policy documents related to social inclusion, education, healthcare and employment, involving citizens, civil society organisations, members of the Roma community and survivors of human trafficking, and securing more public funding.

¹¹ The Ministry of Security of Bosnia and Herzegovina is responsible for ensuring the co-ordination of institutions from Bosnia and Herzegovina, entities, cantons and the Brčko District, as well as international and non-governmental organisations, in implementing the Strategy. It shall submit annual reports to the Council of Ministers on the implementation of the Strategy and the state of human trafficking in Bosnia and Herzegovina.

¹² Council of Europe project "[Strengthening access to justice and effective remedies for victims of human trafficking in Bosnia and Herzegovina](#)", implemented under the [Council of Europe Action Plan for Bosnia and Herzegovina 2022-2025](#) and funded through voluntary contributions.

¹³ USAID / Ministry of Security of Bosnia and Herzegovina: "Evaluation of the implementation of the Strategy to Suppress Trafficking in Human Beings in Bosnia and Herzegovina 2020-2023" (August 2023).

III. Addressing vulnerabilities to trafficking in human beings

1. Prevention of trafficking in human beings

a. Introduction

23. Prevention is crucial in combating trafficking in human beings. Article 5 of the Convention therefore requires States Parties to establish and/or strengthen effective policies and programmes to prevent THB in co-ordination between relevant public agencies, non-governmental organisations and other elements of civil society. Such policies and programmes should have a particular focus on persons vulnerable to trafficking and professionals concerned with trafficking in human beings, and shall include research, information, awareness raising and education campaigns, social and economic initiatives and training programmes. In the development and implementation of prevention measures, States Parties are required to promote a human rights-based approach and to use gender mainstreaming and a child-sensitive approach, taking specific measures to reduce children's vulnerability to trafficking. Furthermore, Article 5 of the Convention requires States Parties to take measures to enable migration to take place legally. In addition, Article 6 of the Convention places a positive obligation on States Parties to adopt measures to discourage the demand that fosters all forms of exploitation of persons which leads to trafficking.

24. The authorities have indicated that the most vulnerable persons to THB come from socio-economically disadvantaged families, especially members of the Roma community who are often exposed to forced begging and forced marriage. Victims are usually recruited in poor rural areas and exploited in larger cities. According to surveys conducted by NGOs among the Roma community,¹⁴ poverty, lack of formal education, unemployment and discrimination are among the root causes of this vulnerability. Moreover, with Bosnia and Herzegovina increasingly becoming a transit country for migrants who want to reach other European destinations, foreign nationals, particularly unaccompanied children, are vulnerable to THB. There is also an increasing demand for migrant workers in sectors such as construction, agriculture and hospitality.

25. The Strategy for Combating Trafficking in Human Beings for 2024-2027 contains a chapter on the prevention of THB, which sets out the following goals: conducting comprehensive public awareness campaigns on THB among the general public and various target groups, including children, parents, teachers, social workers, government institutions and civil society, as well as specific campaigns targeting the most vulnerable groups; improving the prevention of human trafficking for the purpose of labour exploitation, including in supply chains; improving the prevention of child trafficking, in particular by raising awareness of the risks of recruitment and abuse through the use of information and communication technologies; and planning appropriate measures to reduce demand for services of trafficking victims. The Action Plan for Combating Trafficking in Human Beings in the Republika Srpska includes campaigns targeting the most vulnerable groups, providing training on THB to staff of childcare institutions, educators, legal guardians and cultural mediators, enhancing the capacity of competent institutions to manage labour migration by providing information on safe and legal opportunities for employment both within the Republika Srpska and abroad, and promoting clear criteria for the official registration and licensing of mediation agencies.

¹⁴ For example, in 2024 the Association of Roma women "Bolja Budućnost", in partnership with the NGO "Zemlja djece u BiH", conducted a survey on the perception of THB among the Roma population, which included some 400 Roma men and women from four local communities (Kakanj, Donji Vakuf, Sanski Most and Travnik). In the same year, the Association "Novi put" carried out an assessment of the vulnerability of the country's Roma population to THB.

26. The authorities of Bosnia and Herzegovina, international organisations and local NGOs have carried out a number of activities aimed at raising public awareness of THB among the general public and specific target groups. Every year the Ministry of Security of Bosnia and Herzegovina issues a public call to mark the European Anti-Trafficking Day (18 October) through the organisation of awareness campaigns focusing on different forms of exploitation.¹⁵ On 30 July 2023, on the occasion of the World Day against THB, IOM organised an awareness-raising campaign on human trafficking focusing on labour exploitation among domestic and foreign workers, the risks of THB in the digital environment and in sports, and the phenomena of forced begging and forced marriage. The campaign ran until 18 October 2024, marking the European Anti-Trafficking Day.

27. According to the authorities of Bosnia and Herzegovina, the experiences of victims of THB are taken into account when developing anti-trafficking policies. The NGO “Novi početak”, which was founded by survivors of human trafficking,¹⁶ participated in the preparation of the Anti-Trafficking Strategy for 2024-2027 and its Action Plan as well as the Anti-Trafficking Action Plan in the Republika Srpska, with support from the previously mentioned Council of Europe anti-trafficking project (see paragraph 20). Noting the importance of taking into account the lived experiences and views of victims and survivors of trafficking when designing anti-trafficking policies and measures, GRETA invites the authorities of Bosnia and Herzegovina to set up a trafficking survivors’ advisory council. Reference is made in this context to the ODIHR Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils.¹⁷

b. Measures to prevent the vulnerability of specific groups to trafficking in human beings

28. This section examines the preventive measures taken with regard to certain vulnerable groups based on the information provided by the authorities of Bosnia and Herzegovina as well as non-governmental actors. GRETA underlines that not every individual belonging to one of these groups is vulnerable to human trafficking *per se*, as there are usually additional vulnerability factors involved. The different groups selected should be viewed with due regard to the complexity and intersectionality of vulnerabilities to trafficking.

i. Children and young people

29. In its previous evaluation reports on Bosnia and Herzegovina, GRETA paid particular attention to the prevention of trafficking in children. Similar to the situation at the time of GRETA’s third evaluation, children have constituted the majority of victims of THB identified in Bosnia and Herzegovina in the reporting period (see Appendix 1). In its third evaluation report (paragraph 166), GRETA urged the authorities of Bosnia and Herzegovina to strengthen their efforts to prevent child trafficking through the implementation of a series of measures, which are reflected in the Strategy for Combating Trafficking in Human Beings for 2024-2027 (Section 2.4).

30. The authorities of Bosnia and Herzegovina have referred to several activities implemented during the reporting period, which aimed at the prevention of trafficking in children. By way of example, the Judicial and Prosecutorial Training Centres in the Federation of Bosnia and Herzegovina and the Republika Srpska provided regular training on THB to judicial officers working with children. Training was also provided for education and childcare professionals within the child protection system. In the Republika Srpska, the subjects “Digital world” and “Media literacy” were included in the curriculum of primary schools as part of the awareness-raising efforts, and the Ministry of the Interior organised campaigns in schools which focused on the risks of human trafficking and the safe use of the internet.

¹⁵ For example, on the subject of arranged child marriages (2022), THB in the context of migration (2023) and THB through the internet and technology (2024).

¹⁶ The NGO was established by some of the victims of THB for labour exploitation in the case of *Zoletić and Others v. Azerbaijan*.

¹⁷ OSCE/ODHIR, Guidance on establishing and maintaining National Survivors of Trafficking Advisory Councils, 2024.

31. In 2022, several training sessions were organised by the Council of Europe, in co-operation with the Ministry of Security of Bosnia and Herzegovina and the relevant authorities of the entities and the Brčko District, on the role of education institutions in the protection of children from human trafficking. Over a hundred professionals from primary and secondary schools and centres for social work from the Republika Srpska, the Brčko District and the Sarajevo Canton participated in those training sessions, along with representatives of specialised NGOs. Another training session entitled “Technologically enhanced child trafficking” was held in October 2022 within an annual symposium of prosecutors of Bosnia and Herzegovina, which involved 25 participants from prosecutor’s offices and police at all levels of government. Furthermore, in 2024 and 2025, IOM organised targeted awareness-raising sessions for secondary school students (and a limited number of primary school students). More than 250 students, teachers and parents participated in these sessions in Sarajevo and Brčko. Special attention was given to sessions held at the Institute for Hearing and Speech Rehabilitation for children with communication difficulties, including Roma youth.

32. The NGO IFS-EMMAUS carried out online campaigns related to raising awareness of the risks of child trafficking and the prevention of THB and violence against children in the digital environment and developing materials for schools and educational institutions covering topics such as recognising the signs of THB, reporting suspicious activity and internet safety.¹⁸ In 2024, IFS-EMMAUS produced an illustrated education material for children and young people titled “Everything you need to know about trafficking in human beings”. IFS-EMMAUS has also organised webinars and online training for parents, teachers, social workers and other professionals on recognising and responding to all types of violence against children in the digital environment as well as on trafficking in human beings.¹⁹ In addition, online platforms such as www.mfs-emmaus.ba, www.sigurnodijete.ba and www.eurcenter.ba provide information and resources related to the protection of children from violence and trafficking. These portals offer guidance and mechanisms for reporting online violence and an SOS hotline to support victims, enabling easy access to key information for all interested parties.

33. In 2022 the NGO Vermont Youth Centre, with the support of Save the Children, launched the campaign “Day-care centre – our big-hearted house”, in the framework of which training sessions on the use of the media and social networks were held in all day-care centres for children living and/or working in the street. Further, in 2023 and 2024, the NGO “Centar ženskih prava” organised a series of information sessions and expert forums which involved more than 170 professionals and practitioners from across the country, as well as a public advocacy campaign called “Voice of victims of human trafficking”, within which three short documentaries based on true events around child victims of THB were produced. Another example is an online course (www.zanasubuducnost.ba) on the rights of children and women, which also covers the topic of THB, developed by the NGO “Medica Zenica”.

34. Day-care centres have a significant preventive role in the field of trafficking, especially THB for the purpose of forced begging. One of the measures to enhance the prevention of child trafficking outlined in the Strategy for Combating Trafficking in Human Beings for 2024-2027 is to ensure adequate financial support for the sustainability of day-care centres for children who work and/or live on the streets or are at risk of becoming street children. In their reply to the Committee of the Parties’ Recommendation CP(2024)04,²⁰ the authorities of Bosnia and Herzegovina acknowledged that the situation in this area remained problematic. For example, the day-care centre operating within the cantonal public institution “Education Centre” in the Sarajevo Canton could involve only a limited number of children in its activities, due to a lack of programmes tailored to the specific needs of this category of children. Furthermore, there was not enough capacity for children who were considered to be in need of alternative housing.

¹⁸ It is noteworthy that these campaigns were designed to be inclusive for persons with disabilities.

¹⁹ Some 125 educational workshops and webinars were held by IFS-EMMAUS in 2020-2024 for parents/guardians, teachers, social workers and other professionals. More than 3 600 participants acquired knowledge about the prevention of violence against children and gender-based violence in the digital environment, as well as THB.

²⁰ <https://rm.coe.int/report-submitted-by-the-authorities-of-bosnia-and-herzegovina-on-measu/1680b2bd6f>

35. Children in institutional care, particularly those placed in centres for children with behavioural challenges, are at risk of exploitation and THB, and there is insufficient support for young people leaving such institutions at the age of 18. In this context, GRETA notes with concern that Bosnia and Herzegovina lacks a comprehensive strategy for the de-institutionalisation of childcare to support transition to family- and community-based care. Such a transition is crucial for preventing trafficking of children, by creating stable, supportive family environments and reducing reliance on institutional settings vulnerable to exploitation. In their comments on the draft GRETA report, the authorities indicated that the Ministry of Health and Social Protection of the Republika Srpska is implementing, with the support of UNICEF, a programme for strengthening the social and child protection system and that a transition plan has been developed for the “Rada Vranješević” Home for Children without Parental Care in Banja Luka.

36. Measures aimed at reducing the vulnerability of Roma children and of unaccompanied children are described in paragraphs 42-46 and 73-74 of the report.

37. While welcoming the steps taken in Bosnia and Herzegovina to prevent child trafficking, GRETA notes that awareness-raising activities in this area largely depend on civil society initiatives funded almost exclusively by international donors. Clearly, there is a need for a more active involvement of the education system in the prevention of THB. It also appears that no research has been conducted into the vulnerabilities to trafficking of different groups of children that would serve as a basis for developing targeted preventive measures.

38. GRETA once again urges the authorities of Bosnia and Herzegovina to provide adequate financial support to day-care centres for children in street situations so as to guarantee the sustainability of their activities, and to increase accommodation facilities to meet the needs of emergency protection for children at risk of exploitation.

39. Further, GRETA considers that the authorities of Bosnia and Herzegovina should intensify their efforts to prevent trafficking in children and young persons, including by:

- continuing to raise awareness among children, parents and other caregivers regarding children's rights and the risks of human trafficking for different types of exploitation, with a particular focus on online methods of recruitment, paying closer attention to children in vulnerable situations;
- raising the role of the education system in the prevention of child trafficking by providing regular training on THB to teachers and other professionals working with children;
- accelerating the de-institutionalisation of children living in specialised institutions with a view to reducing their vulnerabilities to trafficking, and developing alternative models of accommodation and community-based services;
- implementing programmes aimed at supporting the socio-economic integration of children leaving residential care;
- conducting research into the vulnerabilities to THB of different groups of children and developing specific measures aimed at those groups.

ii. Disadvantaged minorities

40. The vulnerability of the Roma national minority²¹ to trafficking in human beings in Bosnia and Herzegovina was already highlighted in the previous GRETA reports. According to multiple reports and studies,²² the Roma in Bosnia and Herzegovina continue to have limited access to employment, education, healthcare and housing, which are among the root causes of their vulnerability to THB (see also paragraph 24). Roma, especially women and children, are vulnerable to different types of exploitation, including through forced marriage and forced begging.

41. Bosnia and Herzegovina has adopted an Action Plan for 2021-2025 for the Social Inclusion of Roma. The priority areas include civil registration of the Roma population, anti-discrimination, anti-gypsyism, and access to housing, employment, healthcare and education. However, the implementation of the Action Plan has been problematic, due to the lack of sufficient funding.²³ Further, the Strategy for Combating Trafficking in Human Beings in Bosnia and Herzegovina (2024-2027) recognises the vulnerability of the Roma to human trafficking and outlines measures aimed at preventing it. These include conducting awareness-raising campaigns among the Roma population, as well as professionals from various sectors, on the harms of child begging and child marriages, emphasising that these behaviours are not cultural phenomena within the Roma community but criminal acts punishable by law, and implementing programmes to combat prejudice, stereotypes and discrimination against the Roma in the education system.

42. According to members of the Roma Committee met by the GRETA delegation, there has been an increase in recent years in the number of Roma children enrolled in primary and secondary education, with school drop-out rates gradually going down (though still relatively high). Reference was made in this context to measures that have been implemented to improve access to education, such as the provision of free textbooks and transportation to school. It was also indicated that Roma mediators played an important role in encouraging Roma children to pursue education, through family visits and direct communication with children who have dropped out of school.

43. The delegation's interlocutors also pointed to a gradual decrease in the incidence of human trafficking among Roma children, especially when it comes to child begging. Reference was made to Tuzla where the number of Roma children engaged in begging has apparently significantly decreased. This was largely attributed to the fact that domestic courts have started rendering convictions in child begging cases in respect of parents exploiting their children. However, the same could not be said of child marriages. Once again, GRETA received reports that the competent authorities often did not investigate cases of potential child marriage involving members of the Roma community, displaying a degree of tolerance towards this harmful practice.

44. Civil society representatives met during the visit stressed that there was a lack of proactive measures on the part of the competent authorities aimed at preventing child marriages. One of the reasons for the lack of adequate response to child marriages is the fact that they are often seen by public officials as part of local traditions (see also paragraph 103). In a report published in January 2024, the Institution of the Human Rights Ombudsperson of Bosnia and Herzegovina concluded that, despite certain progress, child marriages continued to constitute a troubling phenomenon, particularly affecting the Roma community.²⁴ The report makes recommendations to the authorities of the entities and the Brčko District

²¹ There are 17 recognised national minorities in Bosnia and Herzegovina, the Roma being the largest of them.

²² See, for example, the European Commission's Bosnia and Herzegovina 2024 Report, the Fifth Opinion on Bosnia and Herzegovina by the Advisory Committee on the Framework Convention for the Protection of National Minorities and the sixth monitoring round report on Bosnia and Herzegovina by the ECRI.

²³ See European Commission, Bosnia and Herzegovina 2024 Report, p. 43.

²⁴ [Specijalni izvještaj o maloljetničkim brakovima u Bosni i Hercegovini](#) (January 2024).

to tackle this phenomenon, including by awareness raising and training relevant professionals as well as by introducing a complete ban on marriages involving individuals under 18.²⁵

45. Several projects have been implemented during the reporting period, mainly by NGOs, to reduce the vulnerability of Roma children to THB. For example, the NGO “Novi put” has regularly organised literacy courses for Roma children who have dropped out of school. The NGO “Vaša prava” has conducted activities to raise awareness of THB through focus groups in Roma settlements. Particular attention was paid to familiarising members of the Roma community with the sanctions stipulated in the law for the commission of THB-related offences, and co-operation was initiated with Roma representatives and employees of social work centres regarding the timely provision of information about instances of forced begging and child marriage as the predominant forms of trafficking affecting the Roma population. In addition, the Centre of Women's Rights produced a video entitled “Human trafficking must not be attributed to custom, tradition or culture” to draw the attention of the general public to the dangers facing young girls. Reference should also be made to the work of mobile identification teams in some cantons of the Federation of Bosnia and Herzegovina, which are involved in assisting Roma children in street situations, including through their accommodation in day-care centres.

46. GRETA welcomes the steps taken to address the vulnerability of Roma children to forced marriage and forced begging, including through awareness and educational campaigns, and prevention of school drop-outs. It also appears from the information available that law enforcement and judicial authorities have started paying increased attention to cases of THB for the purpose of forced begging. Nonetheless, more work should be done among the Roma community and the relevant professionals on raising awareness of the harmful nature of these phenomena, and in particular the detrimental effects of child marriage on the physical and mental health and well-being of girls. In this regard, members of the Roma Committee met by the GRETA delegation stressed a need to have permanently engaged Roma mediators on THB-related issues in addition to those who operate in the framework of various project activities. Furthermore, efforts should be made to address poverty and social exclusion of the Roma, which constitute root causes of trafficking in human beings.

47. While welcoming the measures taken by the authorities of Bosnia and Herzegovina to address the vulnerabilities to THB of the Roma community, GRETA urges the authorities to strengthen their efforts to prevent the harmful practice of child marriage, including through programmes empowering Roma girls, sensitising and training teachers, social workers and other professionals working with Roma children, and engaging local communities.

48. Further, GRETA considers that the authorities of Bosnia and Herzegovina should take additional steps towards the prevention of trafficking in human beings among the Roma community, namely by:

- raising awareness of the Roma population, as well as the general public, about trafficking in human beings, including for the purpose of forced begging and forced marriage;
- providing training on THB to professionals working with the Roma community, including social workers, school teachers, healthcare professionals, representatives of law enforcement and local administration officials, to help them recognise the signs of THB;
- further strengthening the role of Roma mediators in the prevention of THB;

²⁵ According to the family laws of the entities and the Brčko District, a juvenile over the age of 16 may be allowed to enter into a marriage under certain conditions. Requests for such marriages may be granted by the court if the relevant centre for social work has determined the existence of the conditions and justified reasons for marriage and mental and physical preparedness of the individual concerned, guided by the best interests of the child.

- implementing effective measures to address the root causes of human trafficking among the Roma community, such as poverty, unemployment, social exclusion, and school drop-out.

iii. Vulnerabilities related to the gender dimension of human trafficking

49. The necessity of adopting a gender-sensitive approach in the national response to THB is recognised in the Strategy for Combating Trafficking in Human Beings in Bosnia and Herzegovina for 2024-2027, which refers to differences between the trafficking of women and men, including as regards the forms of victim exploitation and recruitment methods, and underlines that support measures for trafficking victims should be gender-sensitive, taking into account the varying needs of male and female victims. Further, the Strategy contains a section on special protection of women victims of trafficking that should be ensured through specific measures, such as preventing stigmatisation and negative stereotypes towards female victims of sexual exploitation among both the general public and government officials, promoting the understanding by the police and prosecution authorities of the traumas of sexual violence, and involving female police investigators in trafficking cases where potential victims are women, especially in cases of suspected sexual exploitation and forced marriage.

50. Women in Bosnia and Herzegovina consistently face higher unemployment rates than men,²⁶ are more affected by poverty and social exclusion and are less protected from domestic and gender-based violence.²⁷ According to a 2019 OSCE survey,²⁸ 48% of women in Bosnia and Herzegovina have experienced some form of abuse since the age of 15, including intimate partner or non-partner violence, stalking and sexual harassment. In its 2022 Baseline evaluation report on Bosnia and Herzegovina,²⁹ GREVIO urged the authorities to promote long-term awareness-raising campaigns among the population, which should address underlying patriarchal and stereotypical attitudes towards women and portray a gendered understanding of violence against women.

51. The Gender Action Plan of Bosnia and Herzegovina for 2023-2027 recognises THB as a form of gender-based violence and contains a range of measures designed to address gender-specific vulnerabilities to human trafficking, including raising awareness regarding the risks of trafficking and training law enforcement officials and labour inspectors on gender-sensitive approaches in the fight against THB.

52. The NGO Medica Zenica has launched an online application called “Prijavi nasilje” (“Report violence”), through which citizens can inform themselves or report any form of gender-based violence, including THB.

53. Prostitution is an administrative offence in Bosnia and Herzegovina. That said, the authorities indicated that law enforcement bodies at all levels are regularly instructed to apply the non-punishment principle whenever indicators of trafficking are present, including in cases involving prostitution (see also paragraph 131). The authorities also informed GRETA that programmes supporting persons wishing to exit prostitution are implemented through NGOs contracted by the competent authorities. These programmes provide safe accommodation, psychosocial and legal assistance, medical services, vocational training and employment support, and operate within a standardised referral and co-ordination mechanism.

²⁶ See [Bosnia and Herzegovina in figures, 2024](#).

²⁷ [Promoting gender equality and combating gender-based violence and stereotypes as means of combating trafficking in human beings](#) (Council of Europe, 2022).

²⁸ [OSCE-led survey on violence against women: Bosnia and Herzegovina](#) (OSCE, 2019).

²⁹ <https://rm.coe.int/grevio-baseline-evaluation-report-on-bosnia-and-herzegovina/1680a8e5f1>

54. GRETA considers that the authorities of Bosnia and Herzegovina should take further steps to address the vulnerabilities related to the gender dimension of human trafficking, including through awareness raising and training aimed at eliminating sexual and gender-based violence. GRETA also considers that the authorities of Bosnia and Herzegovina should raise awareness among persons in prostitution about the risks of human trafficking and the support services available to victims, and ensure that there are accessible exit programmes for those wishing to leave prostitution.

iv. Migrant workers

55. In its third evaluation report, GRETA urged the authorities of Bosnia and Herzegovina to take additional steps to prevent and combat THB for labour exploitation, in particular by making available sufficient staff and resources to labour inspectors and ensuring that labour inspectors, law enforcement officials and other relevant actors increase their outreach work and strengthen co-operation with a view to identifying victims of THB.

56. There has been an increasing demand for foreign workers in Bosnia and Herzegovina in recent years. The annual quota of work permits for foreigners in 2025 was set at 7 229 (both for extended and new employment),³⁰ about 20% more than in 2024 (when it was 6 073). The number of work permits issued in 2023 was 4 586. In 2024, work permits were mainly issued for construction (22.5%) and manufacturing (14.5%) industries. The majority of foreign workers came from Türkiye, Serbia, Nepal, Bangladesh, China, Pakistan and India.

57. The Strategy for Combating Trafficking in Human Beings in Bosnia and Herzegovina for 2024-2027 recognises the leading role of labour inspectors in preventing and identifying human trafficking for labour exploitation. It envisages measures aimed at providing sufficient staff and resources, as well as adequate training for labour inspectors, and ensuring that labour inspectors, law enforcement officers and other relevant professionals increase fieldwork, particularly at high-risk sectors. The Strategy also highlights the need to intensify engagement with the private sector, strengthen efforts to curb the spread of fraudulent online job offers and enhance oversight of employment and private recruitment agencies.

58. The legal framework regulating the employment of migrant workers in Bosnia and Herzegovina comprises several legislative acts, notably the Law on Foreigners of Bosnia and Herzegovina and the entity/district Laws on Employment of Foreigners and on Labour. According to the 2015 Law on Foreigners, work permits for foreign nationals are issued for a specific employer and/or for a specific type of job by the employment agencies functioning at various levels of government, for a period not exceeding one year.³¹ A temporary residence permit is then issued by the Service for Foreigners' Affairs (SFA) for the period covering the validity of the work permit. The law provides for an additional period of 30 days during which foreigners can stay in Bosnia and Herzegovina to look for employment in case their previous contract has been terminated. Foreign nationals who have been granted a temporary stay based on a work permit are allowed to change their employer or workplace during the validity of the residence permit.

59. As mentioned above (see paragraph 18), labour inspectors from the two entities and the Brčko District participate in the meetings of the Strike Force for Combating Trafficking in Human Beings in the capacity of observers. Labour inspectors are also members of the local anti-trafficking co-ordination teams. During the reporting period, the entity/district labour inspectors carried out inspections in various sectors, occasionally conducted jointly with the police or the SFA, mainly checking registrations and contracts of employees, working conditions, means and equipment for work, and employee training in the field of occupational safety. The GRETA delegation was informed that no victims of THB had been

³⁰ Based on the following distribution: 4 490 for the Federation of Bosnia and Herzegovina, 2 000 for the Republika Srpska and 739 for the Brčko District. Under Article 65 of the Law on Foreigners, in certain circumstances work permits may also be issued to a foreigner outside the established annual quota.

³¹ Work permits for seasonal workers are issued for the period between 90 and 180 days within a year.

identified during those inspections. In this regard, some of the representatives of the inspection bodies met by the delegation pointed to the problem of inadequate staff resources and insufficient training, especially as regards THB indicators. GRETA recalls the importance of ensuring that the allocated human resources are sufficient to guarantee the effectiveness of labour inspections and refers in this context to the relevant standards established by the International Labour Organization.³² It was also pointed out that communication with foreign workers represented a major problem, due to a lack of interpreters.

60. There are a number of private agencies in Bosnia and Herzegovina established under the Law on Employment Mediation and Social Security of Unemployed Persons, which provide employment mediation services to foreigners seeking employment in Bosnia and Herzegovina and to citizens wishing to work abroad. The inspection of such agencies falls within the competence of labour inspectorates. However, according to NGOs met by GRETA, there is no effective inspection system in place. Several interlocutors expressed concern that foreign workers were not systematically informed of their rights and the conditions of their employment, while many foreign workers had difficulty understanding their contracts which are usually in Bosnian.

61. GRETA was informed of a recent case of a Philippine woman who was identified as a potential victim of trafficking for labour exploitation. It became apparent that she had come to Bosnia and Herzegovina legally with a promised monthly salary of €500 to work in a restaurant in Tuzla. She had allegedly been forced to work long hours as a waitress and a cleaner, for which she had only received a small payment due to the deduction of accommodation and paperwork costs by the restaurant owner, and had also allegedly been sexually exploited, before she managed to contact the NGO “Vaša prava” (see paragraph 149). According to information provided by the authorities in their comments on the draft GRETA report, the trial of this case before the Court of Bosnia and Herzegovina is nearing conclusion. GRETA was also informed of another recent case involving several construction workers from Türkiye who had been recruited by a construction company with the promise of substantial earnings which they apparently never received. According to information provided by the authorities, in the framework of the criminal investigation into this case, which is still in progress, three suspects were arrested in November 2025, following which pre-trial detention and other restrictive measures were ordered, including against a legal entity.

62. The Labour and Employment Agency of Bosnia and Herzegovina informs the public, through regular media releases, about legal and safe labour migration, and its website contains information about safe labour migration to certain countries. Bilateral labour mobility agreements have been concluded to facilitate safe migration of workers from Bosnia and Herzegovina to countries such as Germany, Serbia, Slovenia and Qatar. Further, to prevent potential labour and/or sexual exploitation of Bosnian citizens abroad, the NGO “Novi put” established an information point on safe migration in October 2023 in Mostar, which has since received over 300 enquiries from those interested to work abroad.

63. A number of activities have been carried out by international organisations and local NGOs during the reporting period to prevent and combat trafficking for the purpose of labour exploitation. By way of example, on 17-21 February 2025, the OSCE Mission to Bosnia and Herzegovina organised simulation-based training in Sarajevo, which involved over a hundred professionals working in the area of combating THB, including police officers, prosecutors, labour inspectors, NGO representatives, psychologists and interpreters. From September 2023 to August 2024, IOM organised a series of meetings, consultations and capacity building training for key actors in the management of labour migration in Bosnia and Herzegovina. The trainings included representatives of governmental and non-governmental institutions, academia and the private sector, and focused on the identification of crisis points in the preparation of foreign workers, employers and institutions. IOM also organised specialised workshops for first responders in Bihać (9-10 October 2025) and Sarajevo (11-19 November 2025). Further, the previously mentioned digital awareness campaign led by IOM (see paragraph 26) served to sensitise the general public about

³² See ILO, [Guidelines on general principles of labour inspection](#) (2022), pp. 20-21.

the risks of labour exploitation among domestic and foreign workers and pointed to the dangers of THB in digital spheres, such as online advertising and employment.

64. From April to June 2022, a series of online courses on combating THB for the purpose of labour exploitation was conducted through the Council of Europe HELP Programme (Human Rights Education for Legal Experts), in co-operation with the Ministry of Security of Bosnia and Herzegovina and the Judicial and Prosecutorial Training Centres of the Federation of Bosnia and Herzegovina and the Republika Srpska. The courses involved 25 participants from among the police, prosecutors, social workers, labour inspectors and representatives of NGOs. Further, a workshop on combating THB for the purpose of labour exploitation was organised by the Council of Europe for law enforcement officers and labour inspectors on 25-26 July 2023 in Konjic.

65. In the framework of the Council of Europe project “Strengthening anti-trafficking action in Bosnia and Herzegovina,”³³ training sessions on combating THB for labour exploitation were held for over 50 professionals in Banja Luka, Bihać, Brčko and Sarajevo. Conducted by certified trainers (selected from among law enforcement officials and labour inspectors) who had earlier undergone specialised training using modules and resource materials developed by the Council of Europe, the training sessions promoted a multisectoral approach involving labour inspectors and law enforcement agencies.

66. In the framework of the above-mentioned Council of Europe project, a model protocol was initiated in 2023 on co-operation between the police and labour inspectorates at the entity, district and cantonal level, in order to facilitate the identification of victims and the investigation of cases of THB for the purpose of labour exploitation, allowing for a faster response by the competent authorities. The protocol aims to promote the practice of joint field inspections by labour inspectors and law enforcement officers with a view to effectively monitoring compliance with the law. The first such protocols were signed in November 2023 between the Ministry of the Interior and the Directorate for Inspection of Canton 10 (Livno), and later between the Ministry of the Interior and the Labour Inspection of the West Herzegovina Canton. The protocol requires the signatories to develop and adopt, within three months, a detailed action plan outlining the role of the police and the labour inspectorates in cases of human trafficking for the purpose of labour exploitation, which will define standard operating procedures, including a list of indicators on how to identify a victim of human trafficking. According to information provided by the authorities, another protocol of this kind was signed in July 2025 between the Brčko District Police and the Inspectorate of the Office of the Brčko District Mayor. However, no further action has reportedly been undertaken, with the two agencies concerned having agreed to hold meetings in February/March 2026 in order to ensure the implementation of the signed protocol.

67. GRETA welcomes the above-mentioned steps taken to raise awareness of THB for labour exploitation and enhance the capacity of relevant professionals to tackle this phenomenon. Referring to GRETA’s Guidance Note on combating trafficking for labour exploitation³⁴ and the Council of Europe Committee of Ministers Recommendation to Member States CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation,³⁵ GRETA urges the authorities of Bosnia and Herzegovina to ensure that:

- sufficient staff and resources are made available to labour inspectorates to enable them to play a frontline role in preventing and detecting cases of THB for the purpose of labour exploitation, in particular among migrant workers;
- labour inspectors, law enforcement officers and other relevant actors increase their outreach work to identify victims of human trafficking for labour

³³ In 2023-2024, the Council of Europe implemented this project in the framework of the Council of Europe Action Plan for Bosnia and Herzegovina for 2022-2025.

³⁴ <https://rm.coe.int/guidance-note-on-preventing-and-combating-trafficking-in-human-beings-/1680a1060c>

³⁵ <https://rm.coe.int/booklet-preventing-and-combating-trafficking-in-human-beings-for-the-p/1680aa08ef>

exploitation, paying particular attention to at-risk sectors, such as the construction and catering industries;

- regular training and guidance are provided to labour inspectors and other relevant officials, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB for the purpose of labour exploitation;
- the work of private employment agencies is subject to effective monitoring, with a view to protecting foreign workers employed through those agencies;
- migrant workers are provided with clear and accessible information about the risks of human trafficking for labour exploitation and the rights of victims of trafficking, as well as their rights under labour laws, in a language and format they can easily understand;
- interpreters are available for the languages commonly spoken by foreign workers during inspections carried out by labour inspectors.

v. Asylum seekers and migrants in an irregular situation

68. As noted in paragraph 24, foreign nationals, particularly unaccompanied or separated migrant children, represent a category which is particularly vulnerable to THB. The Law on Foreigners of Bosnia and Herzegovina guarantees temporary residence on humanitarian grounds for victims of human trafficking, granting them rights to adequate and safe accommodation, emergency medical care, psychological support, information on legal status, legal assistance in the process of pursuing status issues, access to the labour market under the same conditions as other foreigners, and vocational training and education. Further, the Law on Asylum recognises victims of THB as a vulnerable group³⁶ and provides that asylum applications from such groups are to be given priority.

69. Bosnia and Herzegovina is part of the Western Balkans migration route and mainly serves as a transit country for migrants on the way to EU member states. According to statistics from the Ministry of Security, irregular arrivals in Bosnia and Herzegovina recorded in 2025 decreased compared to the previous year: in the first three months of 2025, 2 183 arrivals were recorded against 6 544 in the same period in 2024.³⁷ In August 2025, the authorities reported 1 362 irregular arrivals, the top three countries of origin being Egypt (29%), Afghanistan (21%) and Morocco (15%). Of them, about 1 170 expressed their intention to apply for asylum in Bosnia and Herzegovina, but only 17 did so.³⁸ According to information provided by the authorities, as of May 2025, there were 45 recognised refugees and 223 foreign nationals under subsidiary protection, originating from a range of countries.³⁹ Further, Bosnia and Herzegovina was hosting over 300 Ukrainian nationals displaced by the war in Ukraine at the time of GRETA's visit, who had been granted temporary residence on humanitarian grounds (which allows for stay up to six months) or subsidiary protection (see paragraph 78).

70. There are currently four temporary reception centres for migrants in Bosnia and Herzegovina (located in the Una-Sana and Sarajevo cantons) with a total capacity of about 4 600 places, two of which

³⁶ According to Article 2 of the law, vulnerable groups include “persons deprived of legal capacity, children, unaccompanied children, elderly and frail people, ill persons, persons with disabilities, pregnant women, single parents with minor children, persons with mental disabilities, victims of trafficking, victims of torture, rape or other psychological, physical and sexual violence, such as victims of female genital mutilation”.

³⁷ See [UNHCR Bosnia and Herzegovina monthly update - March 2025](#).

³⁸ According to official statistics, a total of 103 applications for international protection have been lodged with the Sector for Asylum of the Ministry of Security during the first eight months of 2025. The number of such applications received in 2024 was 235.

³⁹ Russia, Türkiye, Palestine, Ukraine, Syria, etc.

are specifically designated for the accommodation of vulnerable categories of migrants, such as families, women, and children. Food, hygiene items, clothes, water and other basic necessities are mainly provided by IOM, with support from the EU.

71. The GRETA delegation visited the temporary reception centre in Blažuj which is managed by the SFA and provides accommodation for single men. Opened in 2019, the Centre is composed of an administration building and numerous metal containers used for accommodation, with a total capacity of 800 places. On the day of the visit, the facility was accommodating approximately 350 foreign nationals, mainly from Afghanistan, Morocco and Syria. The Centre had a high turnover of migrants, the average stay being about 10 days. GRETA's delegation was told that many of those who registered the intention to seek asylum⁴⁰ did not subsequently report to the Centre and had no further contact with the authorities, as they continued their journey to EU countries. Initial interviews with newly arrived migrants were carried out by the Centre's reception officer (who had received training by Frontex on combating THB) or by one of the 12 trained "profiling assistants" who were engaged by UNHCR, in partnership with the SFA, in order to facilitate timely asylum registration and prioritise vulnerable asylum seekers. Particular attention during these interviews was said to be paid to physical and psychological signs of trauma, as well as possible indicators of THB.

72. The authorities of Bosnia and Herzegovina indicated that no victims of THB had been identified as part of the asylum procedure in the reporting period (see, however, paragraph 105). The authorities attribute this state of affairs to the fact that asylum seekers generally stay in the country for a very short period of time, making it difficult to detect possible victims among them. As regards the border police, who conduct the first interview with migrants arriving in the country, GRETA was told by several interlocutors that the officers did not make sufficient efforts – and indeed had limited capacity – to detect possible victims of THB.

73. In case of unaccompanied or separated children who express their intention to seek asylum in Bosnia and Herzegovina, the competent centre for social work is contacted in order to appoint a guardian for the child. However, civil society organisations have expressed concern that centres for social work are overloaded with a wide range of responsibilities, which hinders their ability to effectively represent the interests of the migrant children under guardianship. Moreover, as is the case with adults, unaccompanied children often spend only a few days at the reception centre before continuing their journey towards other countries. It was also pointed out that providing interpretation for certain languages spoken by migrant children, other than English, could be a challenge.

74. The GRETA delegation visited a safe house for unaccompanied/separated children in Sarajevo, run by the NGO Jesuit Refugee Service. It had 20 beds (of which 13 were occupied at the time of the visit) and operated under a semi-open regime, with children free to leave during the day. A team of social workers and psychologists offered psychosocial support and other activities, while some of the children benefited from schooling. The delegation was told by staff of the safe house that they often came across cases of presumed victims of exploitation (such as forced criminality and labour exploitation) among unaccompanied children but the competent social welfare authorities did not always react appropriately.

75. The Strategy for Combating Trafficking in Human Beings in Bosnia and Herzegovina for 2024-2027 aims to improve the procedures for the identification of victims of THB among migrants and asylum seekers through training and clear operational guidance for frontline professionals. It also highlights the need to engage a sufficient number of trained translators and cultural mediators for more effective interaction with migrants and asylum seekers. Reference should also be made to the Migration and Asylum Strategy for 2021-2025, one of the objectives of which is to improve the effectiveness of identifying foreigners who are victims of trafficking in mixed migration flows.

⁴⁰ They are issued an attestation of expressed intent to seek asylum which entitles them to legally reside in Bosnia and Herzegovina for up to 14 days.

76. Access to legal assistance and psychosocial services for migrants arriving in Bosnia and Herzegovina is largely dependent on support from international organisations such as IOM and UNHCR. Asylum seekers are provided with free legal aid by the NGO “Vaša prava”, through a programme funded by UNHCR. The NGO BiH Women’s Initiative, another UNHCR partner, provides psychosocial support to asylum seekers and refugees in temporary reception and refugee centres. In addition, IOM regularly provides training for staff of temporary reception centres on the subject of identification and assistance to victims of human trafficking, with a special focus on cultural mediation. GRETA was also informed that Bosnia and Herzegovina had an agreement with the Migration, Asylum, Refugee Regional Initiative (MARRI) for the use of its digital interpretation platform.⁴¹

77. In the period 2020-2024, IFS-EMMAUS developed two posters with information on contacts for informing and reporting any suspicion of human trafficking, available in six languages (BHS, English, Urdu, Pashto, Farsi and Arabic), which were distributed throughout Bosnia and Herzegovina, to law enforcement agencies, border crossings, centres for social work, NGOs and the general public. Further, under the project “Facilitating access to information and justice for migrant women in Bosnia and Herzegovina”, the NGO “Centar ženskih prava” developed easy-to-read material in Arabic, Persian, Urdu and Pashto, with a view to contributing to better informing migrants about their rights as well as to overall efforts for early recognition and prevention of violence against women in migrant accommodation centres.

78. Only a small number of the Ukrainian nationals who arrived in Bosnia and Herzegovina following Russia’s invasion of Ukraine in February 2022 have been granted subsidiary protection, which entitles them to have access to healthcare, education and employment. The vast majority of them (about 90%) have received temporary residence on humanitarian grounds, which entails no such access, increasing their vulnerability to exploitation and human trafficking. In this regard, GRETA shares the view expressed by other international organisations and mechanisms⁴² that the authorities of Bosnia and Herzegovina should activate the temporary protection system provided for in the Law on Asylum in relation to the Ukrainian nationals who are not under subsidiary protection.

79. While recognising the challenges posed by the fact that Bosnia and Herzegovina is mainly a transit country for migrants, GRETA urges the authorities of Bosnia and Herzegovina to take further steps to prevent migrants and asylum seekers from becoming victims of trafficking in human beings, in particular by:

- systematically screening migrants and asylum seekers for vulnerabilities and indicators of THB, in particular at the border, and ensuring that a proper vulnerability assessment is carried out in respect of all foreigners accommodated in the reception/detention centres for foreigners;
- strengthening the capacity of and providing regular training to first-contact authorities, such as the Border Police and the Service for Foreigners’ Affairs, as well as other relevant officials, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB among migrants and asylum seekers;
- providing the centres for social work with adequate human resources and sustainable financial means and arranging for interpretation when needed, with a view to ensuring that unaccompanied and separated children are provided with adequate protection by legal guardians, in order to prevent them from becoming victims of trafficking in human beings.

⁴¹ MARRI promotes regional co-operation in the field of migration, asylum, border control, combating human trafficking, visa regime and integration and return of refugees, with the goal to achieve international and European standards in these fields.

⁴² See, for example, the sixth monitoring round report on Bosnia and Herzegovina by the European Commission against Racism and Intolerance (ECRI), paragraph 86.

vi. Persons with disabilities

80. Persons with disabilities⁴³ are not expressly mentioned in the Council of Europe Anti-Trafficking Convention, but their vulnerability to human trafficking is documented in reports issued by GRETA and other international bodies. Amongst the factors which render persons with disabilities vulnerable to THB are dependence on caregivers or support systems, limited access to information and resources, difficulty communicating or advocating for themselves, stigma and discrimination, as well as lack of or limited access to the labour market and decent work.⁴⁴ Reference can also be made to the Committee on the Elimination of Discrimination against Women (CEDAW) General recommendation No. 38 (2020), which states that women and girls with disabilities are a group particularly vulnerable to being trafficked and calls on States to provide them with special economic and social support,⁴⁵ and the European Disability Forum position paper on combating trafficking in persons with disabilities.⁴⁶

81. Persons with disabilities are among the most vulnerable members of society in Bosnia and Herzegovina. They often face obstacles in accessing education, healthcare, employment and social assistance. Children with disabilities remain one of the most marginalised and excluded groups, facing stigma and discrimination along with inadequate services, especially in healthcare and education, while many of them continue to be placed in residential institutions.⁴⁷

82. According to the authorities of Bosnia and Herzegovina, there have been no victims of THB with mental and/or physical disabilities during the reporting period. However, GRETA was informed by NGOs of recent cases of persons with physical disabilities allegedly involved in forced begging. The Strategy for Combating Trafficking in Human Beings in Bosnia and Herzegovina for 2024-2027 does not contain measures specifically aimed at addressing the vulnerability of persons with disabilities to THB, and no research appears to have been conducted into their vulnerability to trafficking.

83. Bosnia and Herzegovina ratified the UN Convention on the Rights of Persons with Disabilities and its Optional Protocol in 2010 and was evaluated by the Committee on the Rights of Persons with Disabilities (CRPD) in 2017. The Committee recommended, *inter alia*, that Bosnia and Herzegovina promote among employers the right of persons with disabilities to employment on an equal basis with others, take appropriate measures to prevent and combat discrimination against women and girls with disabilities, especially in access to justice, protection against violence and abuse, education, health and employment, and adopt a comprehensive strategy with clear time-bound measures and the allocation of sufficient funds for effective de-institutionalisation.⁴⁸

84. Several strategic documents relevant to the protection of persons with disabilities have been adopted in Bosnia and Herzegovina, namely, the Strategy for Improving the Social Status of Persons with Disabilities in the Republika Srpska for 2017-2026, the Strategy for Improving the Rights and Status of Persons with Disabilities in the Federation of Bosnia and Herzegovina for 2025-2030, the Social Inclusion Strategy of the Federation of Bosnia and Herzegovina for 2021-2027 and the Social Protection Strategy of the Republika Srpska for 2023-2029. Further, by decision of the Council of Ministers of Bosnia and Herzegovina, a Council for Persons with Disabilities was established in July 2023 to ensure co-ordination among the competent state and entity institutions and associations of persons with disabilities, with a view to promoting the rights of these persons.

⁴³ According to Article 1 of the UN Convention on the Rights of Persons with Disabilities, persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

⁴⁴ See OSCE, *Invisible Victims: The Nexus between Disabilities and Trafficking in Human Beings*, March 2022, p. 16.

⁴⁵ CEDAW, [General recommendation No. 38 \(2020\) on trafficking in women and girls in the context of global migration](#), paragraphs 40 and 55.

⁴⁶ <https://www.edf-feph.org/content/uploads/2022/03/EDF-position-on-combatting-human-trafficking-%E2%80%93-review-of-EU-rules-1.pdf>

⁴⁷ European Commission, *Bosnia and Herzegovina 2024 Report*, p. 41.

⁴⁸ See CRPD, *Concluding observations on the initial report of Bosnia and Herzegovina*, adopted in October 2017.

85. In April 2024, the Institution of the Human Rights Ombudsperson issued a follow-up report on the situation in care institutions for persons with intellectual and mental disabilities in Bosnia and Herzegovina, which contains a number of recommendations, including that the state authorities establish a central register of persons with disabilities and that the entity/district governments make further efforts in the de-institutionalisation process, including securing additional financial resources.

86. Civil society representatives met by GRETA during the visit criticised the continued institutionalisation of persons with disabilities, including children, in state-run and private institutions and the slow process of de-institutionalisation. That said, it appears that both entities and the Brčko District have endorsed roadmaps for de-institutionalisation of persons with disabilities, developed in co-operation with UNICEF. In their comments on the draft GRETA report, the authorities indicated that significant efforts are being made by the Republika Srpska towards de-institutionalisation within the framework of the implementation of the Social Protection Strategy for 2023-2029. In 2025, the Institute for Social Protection organised training for relevant professionals and conducted a needs assessment, which identified the following priority areas: the development of community-based services, guidelines for working with persons with disabilities, family support, and participation in choosing the type of protection. Reference was also made to the introduction of financial compensation for parent-caregivers under the Law on Child Protection, which strengthens social security and contributes to preventing institutionalisation.

87. GRETA refers to the most recent Concluding observations of the UN Committee on Economic, Social and Cultural Rights (CESCR) on Bosnia and Herzegovina,⁴⁹ in which the Committee expressed concern about the persistently high level of unemployment among persons with disabilities in Bosnia and Herzegovina. The Committee recommended that the authorities enhance vocational training and education and employment services for persons with disabilities, improve the effectiveness of the quotas for their employment and increase the sanctions in case of non-compliance.

88. GRETA considers that the authorities of Bosnia and Herzegovina should conduct research into the vulnerabilities of persons with disabilities to trafficking in human beings and develop preventive measures specifically aimed at this group. Access to economic and social services for persons with disabilities should be developed as a way to reduce vulnerabilities and risks of trafficking of persons with disabilities.

vii. LGBTI persons

89. GRETA emphasises that, in general, LGBTI people are at an increased risk of becoming victims of trafficking, particularly because they are often marginalised in society and excluded from their families, making them ideal targets for traffickers looking for people with less protection. They also face difficulties in accessing the labour market, as employment opportunities are scarce for those who identify outside the traditional gender binary, leading them to work more in the informal economy (including prostitution) or even to accept abusive job offers. In addition, LGBTI people often represent a significant proportion of children in street situations and can be victims of discrimination by the authorities and services, making them less likely to file a complaint or ask for help.⁵⁰

90. Information received by GRETA from civil society suggests that many LGBTI persons in Bosnia and Herzegovina face discrimination, social exclusion and limited access to employment, which renders them vulnerable to exploitation and possibly trafficking in human beings. A number of instances of hate speech

⁴⁹ CESCR, Concluding observations on the third periodic report of Bosnia and Herzegovina (adopted on 15 October 2021), paragraphs 28 and 29.

⁵⁰ See <https://lac.iom.int/en/blogs/lgbtqi-victims-human-trafficking> and <https://2017-2021.state.gov/wp-content/uploads/2019/02/272968.pdf>

and violence that targeted the LGBTI community were documented over the period of 2023-2024.⁵¹ Moreover, hate crimes and hate speech against LGBTI persons often remain insufficiently prosecuted. The criminal proceedings into the March 2023 attacks on LGBTI activists in Banja Luka⁵² remain on hold, with the perpetrators yet to be brought to justice.

91. According to information provided by the authorities, none of the victims of THB identified during the reporting period was subjected to exploitation on the basis of their sexual orientation and/or gender identity.

92. In July 2022, the authorities of Bosnia and Herzegovina, with the support of the European Union and the Council of Europe, adopted the country's first Action Plan to Improve the State of Human Rights and Fundamental Freedoms of LGBTI Persons for the period 2021-2024. Upon the recommendation of the Ministry of Human Rights and Refugees, the Council of Ministers of Bosnia and Herzegovina has extended the Action Plan's implementation period till the end of 2025. The envisaged activities of the Action Plan are structured around the following strategic objectives: (1) ensuring efficient mechanisms for the protection of LGBTI persons from discrimination and hate crimes; (2) guaranteeing equal rights for LGBTI persons in all areas of public and private life; and (3) raising awareness of the need to combat prejudices and stereotypes regarding LGBTI persons.

93. In 2024, the Ministry of Education and Science of the Federation of Bosnia and Herzegovina introduced a new programme titled "Support for projects on eliminating prejudice amongst the youth against LGBTQ+ population".

94. In April 2024, the first shelter for LGBTI persons was opened in Sarajevo, within the framework of a joint EU/Council of Europe project.⁵³ Operated by the NGO Wings of Hope Foundation, the shelter offers accommodation, psychological support and legal advice to LGBTI victims of domestic violence from all over Bosnia and Herzegovina.

95. GRETA considers that the authorities of Bosnia and Herzegovina should take further steps to address the vulnerability of LGBTI persons to trafficking in human beings, notably by ensuring the effective implementation of the measures envisaged in the Action Plan on LGBTI persons, in close co-operation with civil society organisations, as well as sensitising the staff of the above-mentioned shelter for LGBTI persons to the issue of human trafficking.

⁵¹ See <https://soc.ba/en/pink-report-2025-annual-report-on-the-state-of-human-rights-of-lgbti-people-in-bosnia-and-herzegovina/> and <https://soc.ba/en/27735/>.

⁵² On 18 March 2023, following the cancellation of an event planned by the BiH Pride March in Banja Luka, a large group of masked individuals armed with sticks and bottles physically and verbally attacked LGBTI activists and journalists in the street, leaving some of them injured.

⁵³ The opening of the shelter was supported by the project "Towards an equal, inclusive and tolerant Bosnia and Herzegovina", implemented in the framework of the joint EU-Council of Europe programme "Horizontal Facility for the Western Balkans and Türkiye".

2. Measures to protect and promote the rights of victims of trafficking

96. Chapter III of the Convention provides for a series of measures to protect and promote the rights of victims. In the first place, it is of paramount importance to identify victims of trafficking correctly as identification enables them to benefit from the other measures and rights contained in the Convention. Pursuant to Article 10 of the Convention, States Parties shall ensure that the authorities competent to identify victims of trafficking have persons trained and qualified to perform the identification, and that these authorities collaborate with relevant support organisations in the identification process. Further, Article 12 of the Convention sets out the assistance measures which States Parties must provide to trafficking victims. Paragraph 7 of this article requires Parties to ensure that services are provided taking due account of the special needs of persons in a vulnerable position as well as the rights of children. Given the relevance of victim identification and assistance to the thematic focus of the fourth evaluation round of the Convention, this part of the report examines the application of these two provisions. Other provisions of Chapter III of the Convention, which have been examined in detail by GRETA during the previous evaluation rounds, are discussed in the chapter of the report entitled “Follow-up issues”.

a. Identification of victims of THB

97. The procedure for the identification of victims of THB in Bosnia and Herzegovina remains as described in GRETA's third evaluation report.⁵⁴ According to the Rules on the protection of victims and witnesses of THB who are nationals of Bosnia and Herzegovina and the Rulebook on the protection of foreign victims of human trafficking, any institution, NGO, physical or legal person who suspects or has information that a person might be a victim of trafficking should promptly inform the State Investigation and Protection Agency and the State Prosecutor's Office or the prosecutor's offices and police departments of the entities or the Brčko District. Victims who are nationals of Bosnia and Herzegovina are identified by the law enforcement agencies and prosecutors. In the case of foreigners, the competent authority performing identification is the Service for Foreigners' Affairs (SFA). If the relevant authority concludes that a person is a victim of trafficking, he or she is given the status of “potential victim” and may be accommodated in a safe house accredited by the authorities where assistance is provided irrespective of whether there was a criminal report filed or an indictment raised. A person remains a “potential” victim of trafficking until there is a final conviction for the THB offence. It should be noted that there is no difference between a potential and a formally identified victim in terms of access to assistance.

98. Since 2022, the NGO “Zemlja djece u BiH” has developed local protocols for the prevention and suppression of child trafficking in a number of local communities in Bosnia and Herzegovina. The protocols establish local referral mechanisms which include representatives of the police, guardianship authorities, primary and secondary schools, and health institutions, while in some communities, civil society organisations are also involved (such as shelters, day-care centres, etc.). The protocols define the roles and responsibilities of all actors at the local level in combating child trafficking and provide a detailed roadmap for the actions of local institutions. In addition, the protocols envisage establishing mobile identification teams for proactive identification of potential victims of THB.⁵⁵ GRETA was informed that 11 such teams had been established so far in strategically selected locations (Sarajevo, Bihać, Mostar, Tuzla, Živinice, Bijeljina, Bosanska Krupa, Cazin, Zvornik, Banja Luka, Visoko). The locations were chosen based on the number of children and adults begging on the streets, the size of the Roma communities and the movement of the migrant population. The teams consist of representatives of the local centre for social work and the police (including the border police in border areas), and in certain locations NGOs and Roma

⁵⁴ See paragraph 177.

⁵⁵ These activities have been carried out in the framework of the regional project “Improving the identification and resilience of (potential) victims of human trafficking in the Western Balkans” implemented by World Vision BiH, with the support of the GIZ, and the project “Strengthening national and local capacity in the fight against human trafficking in Bosnia and Herzegovina”, implemented by World Vision BiH in partnership with the NGO “Zemlja djece u BiH”, with the support of the US Department of State.

mediators are also involved (such as Bijeljina, Bihać, Tuzla and Živinice). It is noteworthy that three of the mobile teams, namely those in Tuzla, Mostar and Bihać, have become part of the local referral mechanism, with the city administrations undertaking to finance their work. According to the authorities, mobile identification teams have detected the majority of potential victims in the reporting period.

99. In order to encourage victims of THB to report their situation to the authorities, a secure web application was launched in February 2024, which provides a platform for anonymous reporting without fear of reprisals. Users can submit a report anonymously, describing their situation in detail without the need to disclose personal information. The application provides the option of a direct, secure conversation with a lawyer, allowing users to receive specialised legal advice.⁵⁶ In addition, online platforms such as www.mfs-emmaus.ba, www.sigurnodijete.ba and www.eurcenter.ba provide guidance and contact information for incident reporting, assistance and advice, while guaranteeing anonymity and security for all victims (see paragraph 32). GRETA was informed that, in 2022-2025, IFS-EMMAUS received 544 reports on child exploitation and trafficking via their SOS hotline, all of which were forwarded to the competent police authorities (see paragraph 141). Further, a total of 305 counselling services were provided through the hotline in 2022-2025.

100. Further, in 2022, the Ministry of Security, with the support of IOM, developed an interactive mobile application with key indicators of different forms of THB, which has been disseminated to the relevant frontline officials.

101. According to the authorities, regular training is provided to relevant professionals with a view to facilitating the identification of victims of THB. By way of example, in 2022-2024, the NGO “Zemlja djece u BiH”, through a series of projects supported by the US Department of State, the USAID/INSPIRE Human Rights Support Programme and the Council of Europe, organised training for more than 430 experts from the fields of social protection, education, healthcare and shelters/safe houses, who were members of local referral mechanisms for the prevention and combating of child trafficking. A special focus was put on strengthening the capacity of experts to recognise and respond to cases of potential child trafficking in a timely manner and enabling multisectoral co-ordination at the local level. The training also covered topics such as the improvement of procedures for reporting and intervention in cases of child trafficking, the protection of child victims and work with children who have experienced THB. Further, the NGO “Novi put” organised two two-day training sessions in 2024 for some 70 childcare experts, legal guardians and education professionals from the Herzegovina-Neretva and West Herzegovina Cantons as well as relevant NGOs, which focused on the identification of potential victims, referral mechanisms and available services. In July 2022, IOM organised a workshop entitled “Proactive identification of victims of human trafficking in mixed migration flows” in Jahorina, in co-operation with the Outreach Co-ordinator of the Ministry of Security of Bosnia and Herzegovina (in charge of co-ordinating support for migrants residing outside the temporary reception centres) and the Office of the State Co-ordinator for Combating Trafficking in Human Beings.

102. The Ministry of Security of Bosnia and Herzegovina maintains a statistical portal for data collection on potential victims of THB. Data is directly entered into the portal by the police officers who are the co-ordinators of the local co-ordination teams of the Federation of Bosnia and Herzegovina, the cantons and the Brčko District, while such information from the Republika Srpska is submitted through paper forms.

103. While children represented the majority of potential victims of THB identified in Bosnia and Herzegovina in the reporting period (some 77%), according to civil society organisations, many child trafficking cases are not treated as such by law enforcement authorities, in particular when it comes to Roma children who were forced to beg or engage in street work, which is being treated as “traditional practices”. GRETA was informed of cases of exploitation of children recruited from vulnerable Roma

⁵⁶ This conversation takes place through an encrypted channel, guaranteeing the confidentiality and protection of all exchanged information. The application also allows the user to securely deliver documents and other relevant information needed to provide legal assistance, whether it is photos, videos or official documents.

communities and taken to Mostar to “undergo training” in pickpocketing before being trafficked abroad to cities such as Paris and Brussels.

104. While a total of 15 potential victims of THB for labour exploitation were identified during the reporting period, it is noteworthy that labour inspectors have not detected any cases of human trafficking. As explained in paragraph 59, there are concerns with regard to the human and financial resources of labour inspectorates that would not allow to effectively detect possible victims. Reference was already made in paragraph 66 to the protocol on co-operation between the police and labour inspectorates at the entity/district/cantonal level in the identification and referral of victims and the investigation of cases of THB for the purpose of labour exploitation.

105. According to the authorities, particular attention is paid to indicators of THB during the vulnerability assessment in asylum reception centres (see paragraph 71). That said, no victims of trafficking were identified in the reporting period during the asylum procedure. GRETA was informed that two unaccompanied children from Afghanistan who were staying at the temporary reception centre in Blažuj in 2022 had been recognised as victims of THB for sexual exploitation in the context of the criminal proceedings launched against a group of foreign nationals in relation to migrant smuggling.⁵⁷

106. There have been no identified THB cases in the Republika Srpska during the reporting period. The GRETA delegation was informed that the authorities of the Republika Srpska were working on the development of specific standard operating procedures (SOP) for the identification and referral for assistance of victims of THB. In their comments on the draft GRETA report, the authorities of Bosnia and Herzegovina indicated that the SOP are in the final stages of preparation and will be submitted to the Government of the Republika Srpska for review and possible adoption. GRETA would like to be kept informed of further developments.

107. GRETA pays particular attention to the awareness of staff working in prisons/remand prisons to the issue of trafficking in human beings, given that some victims of THB might be detained/imprisoned as a result of failure to carry out the identification procedure and apply the non-punishment principle. The authorities of Bosnia and Herzegovina have not informed GRETA of any specific training or sensitisation of prison staff on the issue of THB in the reporting period.

108. GRETA was informed that six victims of trafficking (five boys and one woman) were granted a recovery and reflection period⁵⁸ and a residence permit in 2022-2023. The victims originated from Afghanistan, Pakistan and the Philippines.

109. While welcoming the proactive work conducted by mobile identification teams and the provision of guidance and training to relevant professionals, GRETA urges the authorities of Bosnia and Herzegovina to ensure that a procedure is in place for the identification of victims of trafficking among asylum seekers and migrants in an irregular situation, including unaccompanied or separated children, by the border police and in reception centres.

110. Further, GRETA considers that the authorities of Bosnia and Herzegovina should take further steps to improve the identification of victims of trafficking, including by:

- ensuring that relevant actors take a proactive approach and increase their outreach work to identify child victims of THB, including by continuing to pay particular attention to children in street situations and by involving NGOs from the Roma community (see also paragraph 47);

⁵⁷ In March 2024, the two perpetrators in this case were found guilty, *inter alia*, of international trafficking in human beings and were sentenced to 10 and 11 years of imprisonment by the Court of Bosnia and Herzegovina.

⁵⁸ The duration of the recovery and reflection period is 30 days (see Article 60 (2) of the Law on Foreigners and Article 11 of the Rulebook on the protection of foreign victims of human trafficking).

- reinforcing the capacity of labour inspectors to proactively identify victims of trafficking in human beings during labour inspections, including through joint inspections with law enforcement officers (see paragraph 66);
- continuing establishing mobile identification teams in cities and municipalities and providing appropriate long-term and sustainable funding for their activities;
- facilitating the involvement of specialised NGOs in the identification of victims of trafficking in human beings;
- providing training to asylum officials and prison staff on THB, the detection of victims of THB amongst asylum seekers and persons in detention, and where to refer presumed victims.

b. Assistance to victims

111. As described in previous GRETA reports, the procedure for providing assistance to potential victims of trafficking is defined in the Law on Foreigners, the Rules on the protection of victims and witnesses of THB who are nationals of Bosnia and Herzegovina and the Rulebook on the protection of foreign victims of human trafficking.⁵⁹ Nationals of Bosnia and Herzegovina are entitled to safe accommodation, financial aid, psychological counselling, healthcare and resocialisation. Foreign nationals, provided that they are placed in a shelter, are entitled to receive psychological support, legal aid in matters concerning their status and education/vocational training and to have access to the labour market under the conditions applicable to all foreigners.

112. In September 2023, the Council of Ministers of Bosnia and Herzegovina adopted “Minimum Standards for the provision of quality assistance and support to victims of trafficking, especially children” (“the Minimum Standards”). Drawn up in the framework of a project implemented by IFS-EMMAUS, the Minimum Standards provide practical guidance for professionals in relation to the different forms and phases of assistance provided to victims of trafficking, including access to healthcare, education and vocational training, legal assistance during criminal proceedings, repatriation and reintegration, and aim to establish a uniform practice when assisting victims of THB throughout the country.

113. The Ministry of Security of Bosnia and Herzegovina has renewed the co-operation agreements for the provision of accommodation and assistance to victims of THB with four NGOs, namely the Lara Foundation in Bijeljina, the Association “Žene sa Une” in Bihać, the Association “Budućnost” in Modriča and the Association “Žena BiH” in Mostar. The shelters operated by these organisations are designated both for victims of domestic violence and trafficking victims. According to information provided by the authorities, out of 75 potential victims of THB identified in 2023-2024, 62 were assisted in these shelters. The authorities stated that the budget allocation for assistance to victims of human trafficking had significantly increased in 2024, amounting to BAM 210 000 (approximately € 107 400), which is about 60% higher than in 2023. In 2025, the funding disbursed by the Ministry of Security was down to BAM 190 000 (approximately € 97 150). GRETA was informed that, for the year 2026, the amount of BAM 210 000 is earmarked, subject to the adoption of the state budget and international obligations. That said, GRETA’s interlocutors expressed concern that the shelters had only about 20% of their annual operational costs covered by state funding and continued to rely on external funding through projects and donors. It is regrettable that the largest shelter in Bosnia and Herzegovina, operated by IFS-EMMAUS for more than two decades,⁶⁰ was forced to close in January 2024 due to lack of funds to cover operational costs.

⁵⁹ See [GRETA’s third evaluation report on Bosnia and Herzegovina](#), paragraph 190.

⁶⁰ The shelter had 80 places and was the only facility in the country specifically designated for victims of THB, accommodating women, men and children, nationals of Bosnia and Herzegovina and foreigners alike.

114. Although the Minimum Standards require that child victims of trafficking be accommodated in a dedicated facility, there are still no specialised safe houses for child victims in Bosnia and Herzegovina. Moreover, with the closure of the IFS-EMMAUS shelter, the overall shelter capacity for THB victims in the country, in particular for child victims, has significantly reduced. In practice, child victims of THB are usually first placed in emergency shelters where they stay for several days, and are subsequently accommodated in safe houses intended for adult victims of violence. In this context, GRETA was informed that six children who were siblings and had previously been staying together in the IFS-EMMAUS shelter, were separated and accommodated in two different safe houses, giving rise to concerns about potential re-traumatisation of the children.

115. The GRETA delegation visited a safe house in Bijeljina for women and children, managed by the NGO Lara Foundation. Opened in 2011, the safe house is situated in a house with several bedrooms. It was fully occupied at the time of GRETA's visit, accommodating nine victims of domestic violence and seven potential victims of human trafficking, mostly boys and girls of up to 14 years of age. The duration of stay ranged from several days to several months, occasionally years. The safe house employed nine staff members, including a psychologist, social workers and caregivers. Victims could benefit from access to medical care, psychological counselling, legal advice, as well as school education for children. A major issue of concern was that the state funds for the services provided to victims in a given year were not received before the beginning of the following year.

116. In 2024, the NGO "Zemlja djece u BiH" published a study on the reintegration of victims of trafficking, in the framework of the USAID/INSPIRE Human Rights Protection Programme. The study concludes that the process of reintegration of victims relies heavily on the enthusiasm and improvisation of experts working in centres for social work. Professionals involved in the study pointed out that reintegration was difficult to achieve due to numerous legal and financial obstacles. An illustration of this state of affairs was the case of a 16-year-old boy who had spent almost three years in a safe house, during which he had no access to education. After leaving the safe house, he was no longer entitled to regular free-of-charge education. There is no social housing or other forms of housing support for victims of trafficking, nor support in finding employment, which further complicates their reintegration, especially in cases where the victims cannot return to their previous environments due to fear of reprisals.

117. While welcoming the budget increase for the accommodation and assistance to victims of THB, GRETA is concerned that the financial resources provided by the authorities of Bosnia and Herzegovina are still insufficient to meet the needs, notably as regards shelters for trafficking victims. Consequently, GRETA once again urges the authorities of Bosnia and Herzegovina to take steps to improve the provision of assistance to victims of trafficking in human beings, in particular by:

- allocating adequate and sustainable funding from the State budget to victim assistance and ensuring its timely availability for the different services provided;
- ensuring that child victims of THB benefit from appropriate accommodation and access to education, especially by setting up specialised safe houses for children;
- developing victim-centred and age-appropriate programmes for long-term support and integration of victims of THB.

3. Substantive criminal law and procedural law

118. The Convention places on States Parties a series of obligations aimed at enabling the effective prosecution of traffickers and ensuring that they are punished in a proportionate and dissuasive manner.

As the implementation of these provisions of the Convention was examined in detail by GRETA during the preceding evaluation rounds, given the focus of the fourth round, particular attention is paid to the notion of “abuse of a position of vulnerability” and its application in case-law. Further, GRETA has decided to examine as part of the fourth evaluation round the application of Article 19 of the Convention on the criminalisation of the use of services of victims of trafficking.

a. Notion of “abuse of a position of vulnerability” in the law and case-law

119. Abuse of a position of vulnerability is an integral part of the international legal definition of trafficking in human beings and is central to any understanding of trafficking.⁶¹ It is one of the means by which trafficking acts are committed and is relevant to all forms of trafficking and all exploitative purposes. Abuse of a position of vulnerability occurs when “an individual’s personal, situational or circumstantial vulnerability is intentionally used or otherwise taken advantage of, to recruit, transport, transfer, harbour or receive that person for the purpose of exploiting him or her, such that the person believes that submitting to the will of the abuser is the only real or acceptable option available to him or her, and that belief is reasonable in light of the victim’s situation.”⁶²

120. In Bosnia and Herzegovina, the concept of “abuse of a position of vulnerability” in the context of human trafficking is addressed in the criminal legislation at the State, entity and district levels. Article 186, paragraph 1, of the State CC (“international trafficking in human beings”) refers to “abuse of power or influence or a position of vulnerability”. Similar expressions are contained in the CC of the Federation of Bosnia and Herzegovina and the Brčko District. Article 145 of the CC of the Republika Srpska (“trafficking in human beings”) refers to “abuse of authority or influence or a relationship of trust”.

121. According to the authorities of Bosnia and Herzegovina, there is no case-law that specifically interprets the concept of “abuse of a position of vulnerability”.

122. The authorities have informed GRETA of numerous training and specialisation courses organised for the police and prosecutors on dealing with trafficking cases. However, it is not clear to what extent they have addressed the concept of “abuse of a position of vulnerability”. Moreover, it appears that there has been very limited training on THB for judges.

123. GRETA considers that the authorities of Bosnia and Herzegovina should ensure that the abuse of a position of vulnerability of victims of THB is taken into account in the adjudication of criminal cases related to trafficking in human beings. For this purpose, relevant professionals should be provided with training and guidance on how victims’ position of vulnerability may exist or arise and how its abuse may operate in the context of trafficking.

⁶¹ See UNODC Issue Paper *Abuse of a position of vulnerability and other “means” within the definition of trafficking in persons*, United Nations, April 2013, p. 3.

⁶² UNODC [Guidance Note](#) on “abuse of a position of vulnerability” as a means of trafficking in persons in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.

b. Investigation, prosecution and sanctions

124. As explained in GRETA's third evaluation report,⁶³ while the sanctions for the basic offence of THB foreseen by the Criminal Codes of Bosnia and Herzegovina, the Federation of Bosnia and Herzegovina and the Brčko District are harmonised, the CC of the Republika Srpska provides for lower minimum sentences in most cases. In this regard, GRETA notes that the harmonisation of criminal legislation to standardise minimum penalties for the basic form of the offence is envisaged in the Strategy for Combating Trafficking in Human Beings for 2024-2027.

125. GRETA considers that the authorities of Bosnia and Herzegovina should ensure consistent application of the relevant provisions on THB across the country by providing for the same minimum punishment for the basic offence of trafficking in human beings in all four Criminal Codes.

126. The State Investigation and Protection Agency (SIPA), which is in charge of investigating international trafficking cases, maintains a special unit for THB cases with 20 specialised police officers stationed in four regional offices.⁶⁴ Police agencies of some cantons in the Federation of Bosnia and Herzegovina (such as Sarajevo and Tuzla) and the Brčko District also have specialised trafficking units and/or THB focal points. In the remaining police agencies, police officers trained to work on trafficking cases continue to be part of more general departments dealing with organised crime or sex offences.

127. The Section for Combating Trafficking in Human Beings and Smuggling of Migrants of the Prosecutor's Office of Bosnia and Herzegovina has reinforced its team of prosecutors specialised in THB by recruiting a fifth prosecutor. GRETA was informed that these prosecutors received continuous training on THB and maintained close co-operation with the SIPA and other police agencies. In addition, the Brčko District and each canton within the Federation of Bosnia and Herzegovina have a prosecutor specialised in THB. However, GRETA understands that no such specialisation exists within the prosecution service of the Republika Srpska.

128. In 2020, a network of specialised prosecutors and investigators was set up consisting of prosecutors and police inspectors appointed to local anti-trafficking co-ordination teams, a development that was welcomed by GRETA.⁶⁵ The main purpose of the network was to allow for exchange of information between prosecutors and investigators on investigations into THB and related offences. GRETA noted with concern that, after having held only a few meetings, the network had ceased to function, reportedly due to the non-participation of representatives from the Republika Srpska.

129. According to information provided by the authorities of Bosnia and Herzegovina, in the period 2022-2025, 30 persons were indicted for the criminal offences of trafficking in human beings (including organised/international THB). In the same period, 51 persons were convicted of THB, which represents a considerable increase compared to the previous reporting period.⁶⁶ The information provided also suggests that an increasing proportion of convictions for THB carries lengthy prison terms (up to 16 years).

130. The official statistics also include information on prosecutions and convictions for offences related to THB in 2022-2023: a total of 48 persons indicted and 82 convicted for the crimes of "incitement to prostitution", "inducing a child to provide sexual services", "exploiting a child for pornography", "introducing a child to pornography" and "using a computer network or other technical means to commit the criminal offence of sexual abuse or exploitation of a child".

⁶³ See paragraphs 81 and 82.

⁶⁴ Istočno Sarajevo, Banja Luka, Mostar and Tuzla.

⁶⁵ See [GRETA's third evaluation report on Bosnia and Herzegovina](#), paragraphs 115 and 123.

⁶⁶ See paragraph 93, *ibid.*

131. In October 2023, the High Judicial and Prosecutorial Council of Bosnia and Herzegovina issued Guidelines for the judicial procedure, which provides procedural guidance in four areas, namely victim compensation in criminal proceedings and access to free legal aid, the non-punishment of victims of THB for offences they were compelled to commit, the prosecution of users of services provided by trafficking victims, and the prosecution of legal persons involved in trafficking offences. GRETA was informed that, based on the Guidelines, all Chief Prosecutors had issued instructions to prosecutors to consider requesting compensation for trafficking victims during criminal proceedings and granting free legal aid. GRETA's interlocutors noted that there was a better understanding of the non-punishment principle among prosecutors and judges and that it was consistently applied in practice.

132. According to the authorities, greater emphasis is currently placed on cases of THB for the purposes of forced begging and forced labour among children. However, several interlocutors met by GRETA asserted that cases of human trafficking were often re-qualified to lesser offences, such as child neglect or abuse, child marriage or enticement to prostitution, even when there was enough indication that the case involved THB.⁶⁷ The fact that the courts in the Republika Srpska have not handed down a single conviction for human trafficking in the period from 2022 to 2024 does, in GRETA's view, lend credence to claims of this nature. As noted in previous GRETA reports, the Criminal Codes of Bosnia and Herzegovina, the Federation of Bosnia and Herzegovina and the Brčko District include the offence of "international enticement to prostitution"/"enticing to prostitution" and the CC of the Republika Srpska the offence of "soliciting a child to prostitution", which appear to contain some overlapping elements with the offence of "trafficking in human beings". Further, prosecutors and judges met by GRETA acknowledged that investigations into cases of THB for the purpose of child and forced marriage were generally complicated, as it was difficult to secure evidence of the conclusion of marriage and the exchange of money between the families concerned.

133. The authorities of Bosnia and Herzegovina have indicated that the investigating and prosecuting authorities use a wide range of investigative methods to gather evidence (e.g. conducting special investigative actions, searches, video surveillance, etc.) in the investigation of THB cases. However, several interlocutors indicated that the police relied too heavily on the victim's testimony and rarely opened an investigation if the victim was not prepared to testify against the perpetrators. Furthermore, some of the prosecutors met by the GRETA delegation noted that it was not infrequent for them to receive case files from the police with poor evidential support. Indeed, several police officials underlined the need for more resources and capacity building, particularly in terms of new technologies and collecting digital evidence, in order to facilitate the investigation of THB and related offences.

134. In the framework of international co-operation, Bosnia and Herzegovina has participated in Joint Investigation Teams (JIT) focused on trafficking in human beings, collaborating with other countries such as Austria, France, Germany and the Netherlands. In 2022, a JIT was set up with the Netherlands and Austria to investigate a human trafficking case involving the exploitation of children in criminal activities. Another JIT was established with France in a case concerning the exploitation of women and children from Bosnia and Herzegovina for pickpocketing and forced begging in Paris (see paragraph 158). Bosnia and Herzegovina also participates in a joint investigation with Germany in a case of alleged trafficking of young women for sexual exploitation and transporting illicit drugs. It has also concluded an operational agreement with EUROPOL, and the possibility of data exchange is ensured through co-operation with INTERPOL member states.

135. In February 2025, the Brčko District Police reported finding 31 children (aged 0 to 12 years) held in a private house in the Ivici neighbourhood. According to media reports, parents were leaving their children there when they went to work abroad; a 12-year-old girl reportedly ran out of the house and sought help.⁶⁸ GRETA's delegation was informed by the competent prosecutor that, although an

⁶⁷ Apart from the lack of training, this apparent failing was attributed to the widespread perception that forced begging and forced marriage are social problems affecting the Roma community, rather than possible cases of trafficking.

⁶⁸ [Info Bijeljina - Brčaci u šoku: Mještani izjavili da su viđali djecu, čuvala ih "teta"; Jezivi detalji iz kuće strave u Brčkom; Ostavljali decu duži vremenski period da ih "čuva teta" - B92](#); [Gračani u šoku: "Viđali smo djecu, čuvala ih teta" | BN](#)

investigation had initially been launched into suspected human trafficking, no sufficient evidence could subsequently be obtained. According to updated information provided by the authorities of Bosnia and Herzegovina, the owner of the house where the children were kept was charged with the criminal offences of unauthorised practice of a profession (i.e. childcare) and child neglect and abuse, committed in complicity with her son, who was additionally charged with “child exploitation for pornography and committing lewd acts against a child under the age of 15”. Further, the Brčko District Prosecutor’s Office filed eight indictments against 12 parents for child neglect.

136. In another case, eight individuals, including several police officers from the Tuzla Canton, were arrested in October 2025 and charged with trafficking in human beings, in that they had allegedly exploited two underage girls for the purpose of prostitution from April 2024 till July 2025. According to updated information provided by the authorities of Bosnia and Herzegovina, the indictment for human trafficking issued by the prosecutor’s office against the individuals concerned (who remained in pre-trial custody) was accepted by the Cantonal Court in Tuzla.

137. While welcoming the issuance of Guidelines for the judicial procedure in human trafficking cases and the increase in the number of convictions for THB, GRETA considers that the authorities of Bosnia and Herzegovina should take further measures to strengthen the criminal justice response to trafficking in human beings, in particular by:

- ensuring that sufficient human and financial resources are available to the police at all levels of government to facilitate the investigation of trafficking cases, including technology-facilitated THB;
- making use of special investigation techniques in order to gather material, documentary, financial and digital evidence, so that there is less reliance on testimony by victims or witnesses;
- ensuring that human trafficking offences are prosecuted as such, rather than as other/lesser offences, every time the circumstances of the case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted;
- providing systematic and continuous training on the offence of trafficking in human beings, in particular the different constituent elements of this offence and its differences with other related offences, to police officers, prosecutors and judges.

c. Criminalisation of the use of services of victims of trafficking

138. The known use of services of a victim of human trafficking is criminalised in all four Criminal Codes in Bosnia and Herzegovina.⁶⁹ The above-mentioned Guidelines provide procedural guidance regarding the prosecution of users of services provided by trafficking victims. However, according to the authorities, there is still no case-law regarding the application of these provisions, and no investigations have been carried out. GRETA considers that the authorities of Bosnia and Herzegovina should keep the application of the provisions criminalising the knowing use of services of victims of trafficking under review, with a view to ensuring that these provisions are effectively applied in practice.

⁶⁹

See [GRETA's third evaluation report on Bosnia and Herzegovina](#), paragraph 84.

IV. Addressing human trafficking facilitated by information and communication technology (ICT)

139. Countries monitored by GRETA have reported an increased use of information communication technologies (ICT) for recruiting and controlling victims of trafficking. In 2022, GRETA conducted a study to assess the extent to which technology impacts trafficking and explore the operational and legal challenges that states face in detecting, investigating and prosecuting online and ICT-facilitated trafficking.⁷⁰ As highlighted by the study, the impact of technology is particularly acute in relation to the recruitment and exploitation of victims, including their control throughout the different stages of the trafficking process. This study highlighted a number of challenges to the identification, investigation and prosecution of THB cases due to the high volume of online activities and the associated high volume of digital evidence, the use of encrypted communications, nicknames and aliases, and the time-consuming process of acquiring evidence from private companies and/or other jurisdictions. At the same time, anti-trafficking stakeholders are using technological innovations to prevent human trafficking, protect victims, and prosecute traffickers. It is therefore essential to invest in human capital and technological tools to harness the potential of ICT for effectively combating human trafficking.

140. The authorities of Bosnia and Herzegovina have observed that the recruitment of victims of human trafficking has to a large extent shifted to the digital sphere, through which the traffickers target vulnerable persons using different tactics such as fake job offers, grooming and other online schemes aimed at manipulating children and young people.

141. GRETA was informed that cyber units had been established in a number of police agencies across Bosnia and Herzegovina. They monitor the internet for potential cases of online recruitment for trafficking and gather evidence for the eventual prosecution of the perpetrators. Further, the Safer Internet Centre, managed by IFS-EMMAUS, has signed bilateral protocols with the Police Administration of the Federation of Bosnia and Herzegovina, the Ministry of the Interior of the Republika Srpska and the Brčko District Police, according to which any report on violence against children in the digital environment (including inappropriate web content and potential cases of THB) received by the Centre is forwarded without delay to the competent police agency. Any information indicative of THB is also forwarded to the relevant local co-ordination team to ensure a timely response. The authorities have also indicated that law enforcement agencies in Bosnia and Herzegovina have continuous co-operation with ICT companies in the country and abroad. This co-operation includes the acquisition of data based on the orders of the competent courts, while in urgent cases, such as threats to life or abuse of minors, the data is obtained through an accelerated procedure.

142. GRETA was informed that representatives of police authorities organised regular awareness campaigns in schools, focusing on the risks of human trafficking including recruitment through the internet and social networks, and that the subjects “Digital world” and “Media literacy” had been included in the primary school curriculum in the Republika Srpska.

143. Various awareness-raising initiatives on THB associated with the misuse of digital technologies have been developed and implemented by international organisations and NGOs during the reporting period. Reference has already been made to the multiple civil society initiatives in this field, such as online campaigns by IFS-EMMAUS to raise awareness of different target groups on the risks of child trafficking through the internet, along with workshops conducted by the Safer Internet Centre (www.sigurnodijete.ba) for children and young people on the recognition of online threats and protection of personal data and webinars for parents, teachers and other professionals on violence against children in the digital environment, as well as training sessions held by the NGO Vermont Youth Centre for children in street situations on how to use social networks more responsibly. Particular reference should be made to an awareness-raising campaign conducted by IFS-EMMAUS, with the support of the previously

⁷⁰ Paolo Campana, *Online and Technology-Facilitated Trafficking in Human Beings*, Council of Europe: <https://rm.coe.int/online-and-technology-facilitated-trafficking-in-human-beings-full-rep/1680a73e49>, published in April 2022.

mentioned Council of Europe project, in May-November 2025, targeting children, youth, parents, educators and the wider public. The campaign aimed at improving public understanding of online trafficking risks, enhancing key groups' knowledge of such risks and facilitating access to the reporting and support services provided by the Safer Internet Centre. It addressed critical online threats such as grooming, sextortion and deceptive recruitment, while actively promoting helplines, hotlines and police reporting channels, in particular through online visuals, short educational videos, podcast series and printed posters. Furthermore, the digital awareness campaign carried out by IOM from July to October 2024 (see paragraph 26) aimed at sensitising citizens to the dangers of THB in the digital space, notably with regard to fraudulent job advertisements. In May 2024, IOM organised a regional training-of-trainers workshop for law enforcement agencies and social welfare representatives from Bosnia and Herzegovina, Montenegro, North Macedonia and Serbia, aimed at enhancing capacities to combat human trafficking and migrant smuggling, particularly in the digital realm.

144. To support institutions in Bosnia and Herzegovina in addressing the impact of technology on human trafficking, the Council of Europe organised a seminar on technology-facilitated trafficking in human beings in March 2024 in Sarajevo. Some 40 professionals, including representatives of police agencies, prosecutor's offices, bar associations and labour inspectorates, as well as international organisations and NGOs were introduced to the GRETA report "Online and technology-facilitated trafficking in human beings" (see paragraph 139), which provides analysis and guidance on how to enhance the criminal justice response by improving the detection, investigation and prosecution of ICT-facilitated human trafficking. During the seminar, law enforcement representatives presented real-life cases from Bosnia and Herzegovina and discussed challenges in the identification and investigation of online trafficking. The event also emphasised the significance of multisectoral co-operation and capacity-building of all relevant actors as well as the importance of maintaining close co-operation with private companies and the non-governmental sector. Furthermore, a training session on technology-facilitated child trafficking was held in 2022 for prosecutors and police officers at all levels of government (see paragraph 31).

145. Bosnia and Herzegovina is a party to the Council of Europe Convention on Cybercrime (Budapest Convention) since 2006, but has not signed its Second Additional Protocol on enhanced co-operation and disclosure of electronic evidence.

146. GRETA welcomes the above-mentioned activities and considers that the authorities of Bosnia and Herzegovina should develop further measures specifically aimed at preventing ICT-facilitated trafficking in human beings, including investing in capacity building and digital tools to conduct proactive investigations. This should involve training of law enforcement officers and labour inspectors in the areas of internet monitoring and online investigation, such as cyber-patrolling, undercover online investigation, and social network analysis, in order to identify victims of human trafficking recruited and/or exploited online.

147. Further, GRETA invites the authorities of Bosnia and Herzegovina to accede to the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence.

V. Follow-up topics specific to Bosnia and Herzegovina

1. Legal assistance and free legal aid

148. In its third evaluation report on Bosnia and Herzegovina, GRETA noted that, due to the limited capacity of legal aid centres, legal assistance and free legal aid were provided primarily by specialised NGOs, most of which rely on funding from international organisations.⁷¹ GRETA urged the authorities of Bosnia and Herzegovina to facilitate and guarantee victims' access to justice by ensuring that legal representation is secured at an early stage of criminal proceedings.

149. The legal framework for free legal aid, as described in GRETA's third report,⁷² remains unchanged. Legal aid for victims of trafficking continues to be provided by NGOs, in particular "Vaša prava" and "Centar ženskih prava", which do not receive state funding for these services. In 2023, "Vaša prava" provided legal assistance to seven victims of trafficking, one of whom was a national of the Philippines and four were children. In 2024, the organisation provided legal assistance to five victims of trafficking. The NGO "Centar ženskih prava" provided legal assistance to sixteen victims in 2022 and six victims in 2023. Legal aid centres did not provide legal assistance to any victims of trafficking during the reporting period.

150. As noted in paragraph 131, in 2023 instructions were issued to all prosecutors to ensure that victims of human trafficking participating in criminal proceedings are provided with free legal aid.

151. Furthermore, as noted in paragraph 99, in February 2024, a web application was launched enabling victims and witnesses to report cases of trafficking anonymously and obtain specialised legal advice. The application allows for secure, encrypted communication with a lawyer and the confidential transmission of documents and other relevant information. The application is also available in English.

152. GRETA was informed of a workshop on "Co-operation and strengthening the capacity of providers of legal support and free legal aid to victims of human trafficking", held in Konjic (Herzegovina-Neretva Canton) on 20-21 July 2023. The workshop was organised by the Council of Europe in co-operation with the Ministry of Security of Bosnia and Herzegovina and brought together 15 participants, including representatives of legal aid centres.

153. While welcoming the efforts made to improve victims' access to legal assistance and free legal aid, GRETA notes that these services continue to be provided exclusively by NGOs, which do not receive state funding for this purpose. GRETA therefore once again urges the authorities of Bosnia and Herzegovina to take further measures to provide legal assistance and free legal aid to victims of THB, in particular by ensuring that:

- legal assistance is provided systematically and as soon as there are reasonable grounds for believing that a person is a victim of trafficking;
- centres for legal aid play a greater role in providing free legal aid to victims of trafficking. In this regard, the criteria for receiving free legal aid from the legal aid centres should be harmonised throughout the country;
- adequate funding is secured for centres for legal aid and NGOs providing free legal aid to victims of trafficking.

⁷¹ [GRETA's third evaluation report on Bosnia and Herzegovina](#), paragraph 51.

⁷² See paragraphs 45-50, *ibid*.

154. Further, GRETA considers that the authorities of Bosnia and Herzegovina should sensitise the Bar Associations to the need to encourage training and specialisation of lawyers, with a view to providing legal aid to trafficking victims.

2. Compensation

155. In its third evaluation report, GRETA highlighted several obstacles trafficking victims face in obtaining compensation from perpetrators, including the frequent referral of compensation claims to civil courts, the high cost of civil proceedings, the rare confiscation of perpetrators' assets, and the absence of a state compensation fund. GRETA urged the authorities of Bosnia to take further steps to ensure effective access to compensation, in particular by granting compensation orders within criminal proceedings and establishing a state compensation scheme accessible to victims of trafficking.⁷³

156. There have been no changes to the legal framework concerning compensation for victims of trafficking in Bosnia and Herzegovina.⁷⁴

157. As already mentioned (see paragraph 131), in 2023 chief prosecutors throughout Bosnia and Herzegovina issued instructions detailing the actions to be taken by prosecutors in handling property claims submitted by trafficking victims.

158. Despite these guidelines, only a small number of trafficking victims were awarded compensation by criminal courts during the reporting period. Victims continue to be referred to civil proceedings to pursue compensation. One such case (the "Zenica Red House case") concerned several defendants from the Roma community who sent their wives and children to France to engage in pickpocketing and forced begging. The money earned was transferred to the husbands in Bosnia and Herzegovina, who travelled to France to punish their families if insufficient amounts were received. The defendants were convicted of human trafficking by a judgment upheld on appeal in 2023, and compensation was awarded to the victims through criminal proceedings.

159. In the above-mentioned case, several assets were confiscated. However, asset seizure remains rare in other trafficking cases, with the result that victims rarely receive the compensation awarded by the courts.

160. No progress has been made regarding the setting-up of a state compensation fund for victims of human trafficking. A working group established by the Ministry of Justice of Bosnia and Herzegovina to draft a law on the establishment of such a fund held seven meetings but failed to reach agreement among members of the group. In their comments on the draft GRETA report, the authorities indicated that the Strategy for Combating Trafficking in Human Beings in Bosnia and Herzegovina envisages measures aimed at establishing mechanisms for compensation of victims of THB. This is also foreseen in the Anti-Trafficking Action Plans of the Government of the Republika Srpska, the Government of the Federation of Bosnia and Herzegovina and the cantonal governments. GRETA was further informed that, as part of the activities of the co-operation project implemented by the Council of Europe in Bosnia and Herzegovina (see paragraph 20), meetings were organised between the Ministry of Security of Bosnia and Herzegovina and other competent institutions at the State level, as well as between the anti-trafficking co-ordinators and the relevant institutions in the Republika Srpska, the Federation of Bosnia and Herzegovina and the Brčko District, where discussions focused on the possibilities and models for establishing mechanisms to compensate victims of trafficking in human beings.

⁷³ See paragraphs 77, 81 and 83, *ibid.*

⁷⁴ The legal framework is described in paragraphs 65-73 of [GRETA's third evaluation report](#).

161. In view of the rare access of trafficking victims to compensation from perpetrators and the continued absence of a state compensation fund, GRETA once again urges the authorities of Bosnia and Herzegovina to make further efforts to guarantee effective access to compensation for victims of THB, in particular by:

- ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain by the perpetrator from the exploitation of the victim or loss sustained by the victim, is part of the criminal investigation with a view to supporting compensation claims in court;
- ensuring that victims obtain a decision on compensation from the offender as part of the criminal trial and requiring courts to state, where applicable, why compensation is not considered/awarded;
- making full use of the legislation on the seizure and confiscation of assets, as well as international co-operation, to secure compensation to victims of THB, and ensure that recoverable property which is seized in criminal proceedings is returned as soon as possible to the victim;
- including the topic of compensation for victims of human trafficking in the regular training curricula for lawyers, prosecutors and judges;
- setting up without further delay a state compensation scheme accessible to victims of THB, regardless of their nationality and immigration status.

VI. Conclusions

162. Since the publication of GRETA's third report on Bosnia and Herzegovina on 28 June 2022, progress has been made in a number of areas covered by that report.

163. A new Strategy for Combating Trafficking in Human Beings in Bosnia and Herzegovina for the period 2024-2027 was adopted in October 2024, followed by the adoption of anti-trafficking action plans at the state, entity and cantonal levels. The Criminal Code of the Brčko District was amended in 2024 with a view to strengthening the anti-trafficking legal framework. Mobile identification teams, comprising representatives of the police and centres for social work (and in some teams also NGOs and Roma mediators), have been established in order to proactively identify potential victims of THB. In 2023, the High Judicial and Prosecutorial Council of Bosnia and Herzegovina issued Guidelines for the judicial procedure in human trafficking cases, which covers free legal aid, victim compensation and the non-punishment principle. Further, training on THB has been provided to various professionals, including law enforcement, labour and child protection authorities. The number of convictions for trafficking in human beings has considerably increased.

164. GRETA welcomes these positive developments in Bosnia and Herzegovina. However, despite the progress achieved, several issues continue to give rise to concern. A certain number of recommendations made repeatedly by GRETA in its preceding reports have not been implemented or have been only partially implemented. In this report, GRETA once again urges the authorities of Bosnia and Herzegovina to take action in the following areas:

- Identification of victims (Article 10 of the Convention). The authorities of Bosnia and Herzegovina should put in place a procedure for the identification of victims of trafficking among asylum seekers and migrants in an irregular situation, including unaccompanied or separated children, by the border police and in reception centres.
- Assistance to victims (Article 12 of the Convention). The authorities of Bosnia and Herzegovina should improve the provision of assistance to victims of trafficking, in particular by allocating adequate and sustainable funding and ensuring its timely availability for the different services provided. Further, the authorities should ensure that child victims of trafficking benefit from appropriate accommodation, especially by setting up specialised safe houses for children across the country.
- Legal assistance and free legal aid (Article 15 of the Convention). The authorities of Bosnia and Herzegovina should ensure that victims of trafficking have effective access to free legal aid throughout the criminal proceedings, *inter alia*, to enable them to exercise their right to compensation.
- Compensation (Article 15 of the Convention). The authorities of Bosnia and Herzegovina should guarantee effective access to compensation for victims of THB, by ensuring that the collection of evidence about the harm the victim has suffered is part of the criminal investigation, making full use of the legislation on the seizure and confiscation of assets, and including victim compensation in the training of relevant professionals. Further, the authorities should set up without further delay a state compensation scheme accessible to victims of THB, regardless of their nationality and immigration status.

165. Given that these recommendations have been made repeatedly, their priority implementation is requested and will be followed up as part of the monitoring of the implementation of the Convention.

166. As regards the thematic focus of the fourth evaluation round, which is on vulnerabilities to trafficking in human beings, the authorities of Bosnia and Herzegovina have indicated that members of the Roma community, in particular women and children, migrant workers and asylum seekers are particularly vulnerable to THB. The Strategy for Combating Trafficking in Human Beings for 2024-2027 and the related action plans, along with other policy documents, comprise measures targeting the most vulnerable groups.

167. While welcoming the measures taken by the authorities of Bosnia and Herzegovina to prevent trafficking through measures addressed at vulnerable groups, GRETA has identified a number of areas of concern which require further action. The following issues should be addressed as a matter of priority:

- intensify efforts to prevent trafficking in children and young persons by raising awareness about the risks of human trafficking with a particular focus on online methods of recruitment and providing adequate financial support to day-care centres for children in street situations;
- take additional steps towards the prevention of THB among disadvantaged minorities, through awareness raising, training and addressing the root causes of human trafficking among the Roma community, and prevent child marriages, including through programmes empowering Roma girls;
- ensure that labour inspectorates have sufficient staff and resources to be able to increase their outreach work to identify victims of trafficking, including among migrant workers, and that labour inspectors receive regular training and guidance;
- systematically screen asylum seekers for vulnerabilities and indicators of THB and reinforce the capacity and training of border police and other relevant services to detect cases of trafficking among asylum seekers;
- provide centres for social work with adequate human and financial resources to ensure that legal guardians are effectively appointed to unaccompanied and separated migrant children.

168. GRETA welcomes the awareness-raising activities on internet safety carried out for different target groups and the training provided to law enforcement officials, teachers and other relevant professionals, as well as the efforts of the Safer Internet Centre and the police towards the prevention of online abuse of children. In order to address the routine use of ICT to recruit and exploit victims of trafficking, the authorities of Bosnia and Herzegovina should develop further measures aimed at preventing ICT-facilitated trafficking in human beings, including investing in capacity building and digital tools to conduct proactive investigations.

169. GRETA invites the authorities of Bosnia and Herzegovina to keep it regularly informed of developments as regards the implementation of the Convention. GRETA trusts that there will continue to be a political commitment in Bosnia and Herzegovina to sustain the efforts to combat human trafficking by following the human-rights based approach of the Convention and looks forward to continuing the dialogue with the authorities of Bosnia and Herzegovina and civil society.

Appendix 1

Statistics on victims and cases of THB in Bosnia and Herzegovina

The data presented in the table is not directly comparable across States Parties to the Convention due to variations in the methodologies used for data collection.

Indicators		Years			
		2022	2023	2024	2025
Number of identified potential victims		38	37	37	65
Sex and age group	Women	8	9	5	6
	Men	1	0	7	9
	Girls (0-18)	23	17	11	38
	Boys (0-18)	6	11	14	12
Type of exploitation	Forced begging	16	19	12	4
	Labour	5	8	8*	10
	Sexual	8	8	6*	7
	Other forms of exploitation	9	2	11	35
	Unknown				9
Nationality of foreign victims		Pakistan (3) Afghanistan (2) Unknown (1)	Uruguay (2) Croatia (1) Philippines (1) Slovenia (1)	Türkiye (8) Afghanistan (2) Croatia (1) Germany (1) Russia (1)	Croatia (15) India (2) Slovenia (2) Spain (2) Belgium (1) France (1) Unknown (5)
Number of victims accommodated in safe houses/shelters		28	34	24	<i>not available</i>
Number of child victims who were assigned a guardian		29	28	<i>not available</i>	<i>not available</i>
Number of victims who were granted a recovery and reflection period		5	1	<i>not available</i>	<i>not available</i>
Number of victims who were issued residence permits		5	1	<i>not available</i>	<i>not available</i>
Number of investigations		8 (against 11 persons)	7 (against eight persons)	4 (against eight persons)	10 (against 29 persons)
Number of prosecutions		8 (against nine persons)	1 (against two persons)	4 (against six persons)	5 (against 13 persons)
Number of convictions (persons)		9	21	13	8

* Two persons were victims of THB for the purpose of both sexual and labour exploitation.

Appendix 2

List of GRETA's conclusions and proposals for action

The position of the proposals for action in the text of the report is shown in parentheses.

Topics related to the fourth evaluation round of the Convention

Prevention of trafficking in human beings

- Noting the importance of taking into account the lived experiences and views of victims and survivors of trafficking when designing anti-trafficking policies and measures, GRETA invites the authorities of Bosnia and Herzegovina to set up a trafficking survivors' advisory council (paragraph 27).

Measures to prevent the vulnerability of specific groups to trafficking in human beings

Children and young people

- GRETA once again urges the authorities of Bosnia and Herzegovina to provide adequate financial support to day-care centres for children in street situations so as to guarantee the sustainability of their activities, and to increase accommodation facilities to meet the needs of emergency protection for children at risk of exploitation (paragraph 38);
- GRETA considers that the authorities of Bosnia and Herzegovina should intensify their efforts to prevent trafficking in children and young persons, including by:
 - continuing to raise awareness among children, parents and other caregivers regarding children's rights and the risks of human trafficking for different types of exploitation, with a particular focus on online methods of recruitment, paying closer attention to children in vulnerable situations;
 - raising the role of the education system in the prevention of child trafficking by providing regular training on THB to teachers and other professionals working with children;
 - accelerating the de-institutionalisation of children living in specialised institutions with a view to reducing their vulnerabilities to trafficking, and developing alternative models of accommodation and community-based services;
 - implementing programmes aimed at supporting the socio-economic integration of children leaving residential care;
 - conducting research into the vulnerabilities to THB of different groups of children and developing specific measures aimed at those groups (paragraph 39).

Disadvantaged minorities

- While welcoming the measures taken by the authorities of Bosnia and Herzegovina to address the vulnerabilities to THB of the Roma community, GRETA urges the authorities to strengthen their efforts to prevent the harmful practice of child marriages, including through programmes empowering Roma girls, sensitising and training teachers, social workers and other professionals working with Roma children, and engaging local communities (paragraph 47);
- GRETA considers that the authorities of Bosnia and Herzegovina should take additional steps towards the prevention of trafficking in human beings among the Roma community, namely by:

- raising awareness of the Roma population, as well as the general public, about trafficking in human beings, including for the purpose of forced begging and forced marriage;
- providing training on THB to professionals working with the Roma community, including social workers, school teachers, healthcare professionals, representatives of law enforcement and local administration officials, to help them recognise the signs of THB;
- further strengthening the role of Roma mediators in the prevention of THB;
- implementing effective measures to address the root causes of human trafficking among the Roma community, such as poverty, unemployment, social exclusion, and school drop-out (paragraph 48).

Vulnerabilities related to the gender dimension of human trafficking

- GRETA considers that the authorities of Bosnia and Herzegovina should take further steps to address the vulnerabilities related to the gender dimension of human trafficking, including through awareness raising and training aimed at eliminating sexual and gender-based violence. GRETA also considers that the authorities of Bosnia and Herzegovina should raise awareness among persons in prostitution about the risks of human trafficking and the support services available to victims, and ensure that there are accessible exit programmes for those wishing to leave prostitution (paragraph 54).

Migrant workers

- Referring to GRETA's Guidance Note on combating trafficking for labour exploitation and the Council of Europe Committee of Ministers Recommendation to Member States CM/Rec(2022)21 on preventing and combating trafficking in human beings for the purpose of labour exploitation, GRETA urges the authorities of Bosnia and Herzegovina to ensure that:
 - sufficient staff and resources are made available to labour inspectorates to enable them to play a frontline role in preventing and detecting cases of THB for the purpose of labour exploitation, in particular among migrant workers;
 - labour inspectors, law enforcement officers and other relevant actors increase their outreach work to identify victims of human trafficking for labour exploitation, paying particular attention to at-risk sectors, such as the construction and catering industries;
 - regular training and guidance are provided to labour inspectors and other relevant officials, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB for the purpose of labour exploitation;
 - effective inspection of private employment agencies with a view to protecting foreign workers employed through those agencies;
 - migrant workers are provided with clear and accessible information about the risks of human trafficking for labour exploitation and the rights of victims of trafficking, as well as their rights under labour laws, in a language and format they can easily understand;
 - interpreters are available for the languages commonly spoken by foreign workers during inspections carried out by labour inspectors (paragraph 67).

Asylum seekers and migrants in an irregular situation

- GRETA urges the authorities of Bosnia and Herzegovina to take further steps to prevent migrants and asylum seekers from becoming victims of trafficking in human beings, in particular by:
 - systematically screening migrants and asylum seekers for vulnerabilities and indicators of THB, in particular at the border, and ensuring that a proper vulnerability assessment is carried out in respect of all foreigners accommodated in the reception/detention centres for foreigners;
 - strengthening the capacity of and providing regular training to first-contact authorities, such as the Border Police and the Service for Foreigners' Affairs, as well as other relevant officials, with a focus on vulnerabilities that lead to THB and on early detection of cases of THB among migrants and asylum seekers;
 - providing the centres for social work with adequate human resources and sustainable financial means and arranging for interpretation when needed, with a view to ensuring that unaccompanied and separated children are provided with adequate protection by legal guardians, in order to prevent them from becoming victims of trafficking in human beings (paragraph 79).

Persons with disabilities

- GRETA considers that the authorities of Bosnia and Herzegovina should conduct research into the vulnerabilities of persons with disabilities to trafficking in human beings and develop preventive measures specifically aimed at this group. Access to economic and social services for persons with disabilities should be developed as a way to reduce vulnerabilities and risks of trafficking of persons with disabilities (paragraph 88).

LGBTI persons

- GRETA considers that the authorities of Bosnia and Herzegovina should take further steps to address the vulnerability of LGBTI persons to trafficking in human beings, notably by ensuring the effective implementation of the measures envisaged in the Action Plan on LGBTI persons, in close co-operation with civil society organisations, as well as sensitising the staff of the above-mentioned shelter for LGBTI persons to the issue of human trafficking (paragraph 95).

Identification of victims of THB

- GRETA urges the authorities of Bosnia and Herzegovina to ensure that a procedure is in place for the identification of victims of trafficking among asylum seekers and migrants in an irregular situation, including unaccompanied or separated children, by the border police and in reception centres (paragraph 109);
- GRETA considers that the authorities of Bosnia and Herzegovina should take further steps to improve the identification of victims of trafficking, including by:
 - ensuring that relevant actors take a proactive approach and increase their outreach work to identify child victims of THB, including by continuing to pay particular attention to children in street situations and by involving NGOs from the Roma community (see also paragraph 47);
 - reinforcing the capacity of labour inspectors to proactively identify victims of trafficking in human beings during labour inspections, including through joint inspections with law enforcement officers (see paragraph 66);
 - continuing establishing mobile identification teams in cities and municipalities and providing appropriate long-term and sustainable funding for their activities;

- facilitating the involvement of specialised NGOs in the identification of victims of trafficking in human beings;
- providing training to asylum officials and prison staff on THB, the detection of victims of THB amongst asylum seekers and persons in detention, and where to refer presumed victims (paragraph 110).

Assistance to victims

- GRETA once again urges the authorities of Bosnia and Herzegovina to take steps to improve the provision of assistance to victims of trafficking in human beings, in particular by:
 - allocating adequate and sustainable funding from the State budget to victim assistance and ensuring its timely availability for the different services provided;
 - ensuring that child victims of THB benefit from appropriate accommodation and access to education, especially by setting up specialised safe houses for children;
 - developing victim-centred and age-appropriate programmes for long-term support and integration of victims of THB (paragraph 117).

Notion of "abuse of a position of vulnerability" in the law and case-law

- GRETA considers that the authorities of Bosnia and Herzegovina should ensure that the abuse of a position of vulnerability of victims of THB is taken into account in the adjudication of criminal cases related to trafficking in human beings. For this purpose, relevant professionals should be provided with training and guidance on how victims' position of vulnerability may exist or arise and how its abuse may operate in the context of trafficking (paragraph 123).

Investigation, prosecution and sanctions

- GRETA considers that the authorities of Bosnia and Herzegovina should ensure consistent application of the relevant provisions on THB across the country by providing for the same minimum punishment for the basic offence of trafficking in human beings in all four Criminal Codes (paragraph 125);
- While welcoming the issuance of Guidelines for the judicial procedure in human trafficking cases and the increase in the number of convictions for THB, GRETA considers that the authorities of Bosnia and Herzegovina should take further measures to strengthen the criminal justice response to trafficking in human beings, in particular by:
 - ensuring that sufficient human and financial resources are available to the police at all levels of government to facilitate the investigation of trafficking cases, including technology-facilitated THB;
 - making use of special investigation techniques in order to gather material, documentary, financial and digital evidence, so that there is less reliance on testimony by victims or witnesses;
 - ensuring that human trafficking offences are prosecuted as such, rather than as other/lesser offences, every time the circumstances of the case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted;
 - providing systematic and continuous training on the offence of trafficking in human beings, in particular the different constituent elements of this offence and its differences with other related offences, to police officers, prosecutors and judges (paragraph 137).

Criminalisation of the use of services of victims of trafficking

- GRETA considers that the authorities of Bosnia and Herzegovina should keep the application of the provisions criminalising the knowing use of services of victims of trafficking under review, with a view to ensuring that these provisions are effectively applied in practice (paragraph 138).

Addressing human trafficking facilitated by information and communication technology (ICT)

- GRETA considers that the authorities of Bosnia and Herzegovina should develop further measures specifically aimed at preventing ICT-facilitated trafficking in human beings, including investing in capacity building and digital tools to conduct proactive investigations. This should involve training of law enforcement officers and labour inspectors in the areas of internet monitoring and online investigation, such as cyber-patrolling, undercover online investigation, and social network analysis, in order to identify victims of human trafficking recruited and/or exploited online (paragraph 146);
- GRETA invites the authorities of Bosnia and Herzegovina to accede to the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence (paragraph 147).

Follow-up topics specific to Bosnia and Herzegovina

Overview of trends and changes in the legislative, institutional and policy framework for action against human trafficking

- GRETA considers that the authorities of Bosnia and Herzegovina should take the necessary steps to establish an independent National Rapporteur or to designate another existing mechanism for monitoring the anti-trafficking activities of state institutions, as provided for in Article 29, paragraph 4, of the Convention (paragraph 19).

Legal assistance and free legal aid

- GRETA once again urges the authorities of Bosnia and Herzegovina to take further measures to provide legal assistance and free legal aid to victims of THB, in particular by ensuring that:
 - legal assistance is provided systematically and as soon as there are reasonable grounds for believing that a person is a victim of trafficking;
 - centres for legal aid play a greater role in providing free legal aid to victims of trafficking. In this regard, the criteria for receiving free legal aid from the legal aid centres should be harmonised throughout the country;
 - adequate funding is secured for centres for legal aid and NGOs providing free legal aid to victims of trafficking (paragraph 153);
- GRETA considers that the authorities of Bosnia and Herzegovina should sensitise the Bar Associations to the need to encourage training and specialisation of lawyers, with a view to providing legal aid to trafficking victims (paragraph 154).

Compensation

- GRETA once again urges the authorities of Bosnia and Herzegovina to make further efforts to guarantee effective access to compensation for victims of THB, in particular by:
 - ensuring that the collection of evidence about the harm the victim has suffered, including the financial gain by the perpetrator from the exploitation of the victim or loss sustained by the victim, is part of the criminal investigation with a view to supporting compensation claims in court;
 - ensuring that victims obtain a decision on compensation from the offender as part of the criminal trial and requiring courts to state, where applicable, why compensation is not considered/awarded;
 - making full use of the legislation on the seizure and confiscation of assets, as well as international co-operation, to secure compensation to victims of THB, and ensure that recoverable property which is seized in criminal proceedings is returned as soon as possible to the victim;
 - including the topic of compensation for victims of human trafficking in the regular training curricula for lawyers, prosecutors and judges;
 - setting up without further delay a state compensation scheme accessible to victims of THB, regardless of their nationality and immigration status (paragraph 161).

Appendix 3

List of public bodies, intergovernmental organisations and civil society actors with which GRETA held consultations

Public bodies

Bosnia and Herzegovina

- State Co-ordinator for Combating Trafficking in Human Beings
- Ministry of Security
- Ministry of Human Rights and Refugees
- Ministry of Justice
- Ministry of Foreign Affairs
- Court of Bosnia and Herzegovina
- Prosecutor's Office of Bosnia and Herzegovina
- State Investigation and Protection Agency
- Service for Foreigners' Affairs
- Human Rights Ombudspersons
- Roma Committee of the Council of Ministers
- Council for Children
- Council for Persons with Disabilities

Republika Srpska

- Co-ordinator for Combating Trafficking in Human Beings in Republika Srpska
- Ministry of the Interior
- Ministry of Justice
- Ministry of Labour, War Veterans and Protection of Disabled Persons
- Ministry of Health and Social Welfare
- Ministry of Family, Youth and Sports
- Ministry of Education and Culture
- Banja Luka District Court
- Prosecutor's Office
- Labour Inspectorate
- Centre for Free Legal Aid
- Ombudsperson for Children

Federation of Bosnia and Herzegovina

- Ministry of the Interior
- Ministry of Justice
- Ministry of Labour and Social Policy
- Ministry of Education and Science
- Federal Supreme Court
- Cantonal Court in Sarajevo
- Federal Prosecutor's Office
- Federal Administration for Inspection
- Labour Inspectorate of Sarajevo Canton
- Centre for Legal Aid of Sarajevo Canton

Brčko District

- District Police
- Judicial Commission
- Department of Inspection
- Department of Education
- Subdivision for Social Protection and Child Protection
- Court of Appeal
- Basic Court
- Prosecutor's Office
- Office for Legal Aid

Intergovernmental organisations

- International Organization for Migration (IOM)
- Organization for Security and Co-operation in Europe (OSCE)
- United Nations High Commissioner for Refugees (UNHCR)
- United Nations Children's Fund (UNICEF)
- Delegation of the European Union to Bosnia and Herzegovina

Non-governmental organisations

- IFS-EMMAUS
- Save the Children
- Lara Foundation
- Association "Vaša prava"

-
- Association of Roma women “Bolja budućnost”
 - Association “Centar ženskih prava”
 - Association “Novi put”
 - Human Rights Centre in Mostar

Government's comments

GRETA engaged in a dialogue with the authorities of Bosnia and Herzegovina on a first draft of the report. A number of the authorities' comments were taken on board and integrated into the report's final version.

The Convention requires that "the report and conclusions of GRETA shall be made public as from their adoption, together with eventual comments by the Party concerned." GRETA transmitted its final report to the authorities of Bosnia and Herzegovina on 13 March 2026 and invited them to submit any final comments. The authorities did not wish to submit any comments.