

2025 Trafficking in Persons Report: Spain

SPAIN (Tier 1)

The Government of Spain fully meets the minimum standards for the elimination of trafficking. The government continued to demonstrate serious and sustained efforts during the reporting period; therefore, Spain remained on Tier 1. These efforts included convicting more traffickers and issuing adequate prison terms; assisting more victims; opening a new shelter for women sex trafficking victims; and prosecuting a shelter director for child labor trafficking. Law enforcement continued participating in extensive international investigations and partnerships, which resulted in the identification of victims and arrest of suspects. The government passed several laws aimed at increasing protections for trafficking victims, including mandatory reporting, informing victims of their rights, deportation prohibitions, the automatic issuance of a recovery and reflection period, and work and residence permit automation. Although the government meets the minimum standards, the government investigated and prosecuted fewer trafficking crimes. Gaps remained in victim identification, and the government did not report identifying any victims among the asylum-seeker population, despite civil society identifying such victims, and it identified comparatively few children or Spanish nationals. Law enforcement remained the sole entity able to formally identify victims, which limited some victims' access to some government assistance. The government significantly decreased funding for trafficking victim assistance to women and girls and did not report allocating any funding for labor trafficking victims, men, or children; insufficient funding resulted in the closure of at least one emergency shelter for men and women labor trafficking victims. The government did not provide compensation to any victims, as there was no fund from which to do so, and while restitution was awarded to victims, few victims received it from convicted traffickers.

PRIORITIZED RECOMMENDATIONS:

- Improve uniform implementation of national victim identification and referral protocols to increase proactive victim identification, especially among Spanish citizens and vulnerable populations such as children, undocumented migrants, asylum-seekers, sea fishers, and workers in industries and agricultural regions with high incidences of labor exploitation.
- Train front-line officials on proactive victim identification and expand victim service centers to all autonomous communities.
- Allow formal victim identification by and referral from entities other than law enforcement, including civil society and other relevant frontline officials.
- Establish and utilize a state compensation fund for trafficking victims.
- Increase the funding and availability of protection services – including shelter, counseling, and medical care – for all victims, particularly labor trafficking victims, men, and children.
- Continue to improve coordination with an effective multidisciplinary response between government and government-funded NGOs to combat trafficking.
- Adopt a comprehensive, trafficking-specific NAP and dedicate resources toward its implementation.
- Update the Framework Protocol for Protection of Victims of Trafficking to ensure legal aid is not contingent on a lack of sufficient economic resources.
- Ensure victims are not inappropriately penalized solely for unlawful acts committed as a direct result of being trafficked.
- Consistently enforce strong regulations and oversight of labor recruitment companies and hold fraudulent labor recruiters criminally accountable.

PROSECUTION

The government maintained uneven law enforcement efforts.

Article 177 *bis* of the criminal code criminalized sex trafficking and labor trafficking, prescribing penalties from five to eight years' imprisonment, which were sufficiently stringent and, with respect to sex trafficking, commensurate with those for other grave crimes, such as kidnapping. During the reporting period, the government also used Article 187 to prosecute sex trafficking crimes. Article 187 criminalized the use of force, fraud, or coercion to compel a person into "prostitution," and prescribed penalties from two to five years' imprisonment and a fine, which were not commensurate with those for other grave crimes, such as kidnapping. Since at least 2018, civil society noted the need for a stand-alone, comprehensive anti-trafficking law; while the law was approved by the Council of Ministers, it did not advance by the end of the reporting period.

In 2024, law enforcement initiated 141 human trafficking investigations involving the arrest of 407 suspects. Of the 141 investigations by law enforcement, 104 were for sex trafficking and 37 were for labor trafficking, including two for forced criminality. This was a decrease compared with 151 investigations in 2023. After receiving cases from law enforcement, some of which police referred in previous reporting periods, the Office of the Prosecutor initiated 148 follow-up proceedings: 110 for sex trafficking and 38 for labor trafficking, including four for forced criminality. This was a decrease compared with 160 cases in 2023. In 2024, the judiciary initiated prosecutions for 110 suspects – 91 for sex trafficking and 19 for labor trafficking; this was a decrease compared with 123 prosecutions in 2023. In 2024, courts convicted 59 traffickers – 51 for sex trafficking, seven for labor trafficking, and one for both – an increase compared with 34 in 2023. Courts sentenced traffickers to adequate penalties; 41 traffickers (69.5 percent) received significant prison sentences of more than one year's imprisonment. The government did not provide sentencing data for 15 convicted traffickers. Courts upheld 15 appealed trafficking convictions in 2024 and overturned one on appeal. The government did not report any investigations, prosecutions, or convictions of government employees complicit in human trafficking crimes.

The government, often in collaboration with government-funded NGOs, provided comprehensive training to law enforcement, judges, magistrates, prosecutors, labor inspectors, social workers, and other responsible stakeholders on a variety of topics including victim identification and the nexus between migration and human trafficking. However, NGOs continued to report more training for non-specialized law enforcement officers was necessary. Experts noted human trafficking crimes were sometimes pursued as sexual or labor exploitation, which carried lesser penalties, due to the lower evidentiary threshold required for those crimes. GRETA expressed concern regarding the scarcity of prosecutions and convictions for labor trafficking and questioned the government's political will to address labor trafficking, especially within the agricultural sector. Law enforcement continued extensive efforts to cooperate on operations with various international law enforcement organizations. Law enforcement conducted several bilateral and multinational investigations and joint operations, which resulted in the identification of at least 427 victims and arrest of at least 98 suspects across all participating countries. Law enforcement maintained a cyber-trafficking investigative group and regular monitoring of online platforms for information related to trafficking; the group reported success forcing content removal from websites and began engaging with larger online platforms.

The Ministry of the Interior (MOI) coordinated law enforcement efforts through the Spanish National Police (SNP), the Civil Guard (CG), and regional and local security forces, which included specialized law enforcement units to address human trafficking, including the SNP's Central Brigade against Human Trafficking and the CG's Central Operational Unit. The SNP and the CG maintained points of contact to coordinate anti-trafficking activities with other relevant bodies, institutions, and NGOs. The SNP's National Social Liaison Officer was responsible for national coordination of Territorial Social Liaison Officers, who were responsible for investigating and prosecuting human trafficking cases in each autonomous community. Law enforcement continued to partner with officials specialized in money laundering and financial crimes to pursue financial crime investigations in tandem with human trafficking charges when there was an

organized crime element; however, regional authorities noted this was not consistent across the country and recommended a more uniform and integrated approach. Law enforcement agencies noted additional open-source intelligence specialists and a multi-agency database to track the assistance and recovery process for trafficking victims would improve results and efficiency. Regional law enforcement agencies reported specialized units, including anti-trafficking units, frequently had unfilled positions, and NGOs noted high turnover risked continuity within the specialized units. The Office of the Prosecutor for Trafficking in Persons had specialized prosecutors who covered all jurisdictions. The SNP continued to use an operational manual to combat labor trafficking, including forced criminality on cannabis plantations, and judges and prosecutors had a framework guide for trafficking cases, which included sentencing recommendations. The government did not have judges or courts specialized in trafficking; however, sex trafficking cases could be handled in courts dedicated to violence against women and girls. Experts reported judges often lacked adequate training on handling human trafficking cases and had limited access to specialized trafficking training. Law enforcement, NGOs, and specialized prosecutors continued strong and effective coordination, though this varied by region and province.

PROTECTION

The government slightly increased protection efforts.

In 2024, law enforcement reported formally identifying 505 trafficking victims – 256 sex trafficking victims and 249 labor trafficking victims, including three for forced criminality – compared with 497 trafficking victims in 2023. Of the victims formally identified by law enforcement, 17 were Spanish nationals; 10 were children, 308 were women, and 187 were men. Law enforcement remained the sole entity able to formally identify trafficking victims. However, the government also had an administrative accreditation process through which government social services or specifically mandated NGOs could obtain victim status for sex trafficking victims. Administrative accreditation did not require victims to interact with law enforcement and, if approved, accreditation would allow victims to access certain assistance services, such as legal assistance and sometimes temporary residency; however, NGOs noted it was unevenly implemented across Spain and recommended a more victim-centered approach. The government reported approving at least 150 new trafficking victims for accreditation in 2024, compared with 136 in 2023; however, the government did not provide comprehensive information. Government-funded NGOs reported identifying 772 new potential trafficking victims in 2024 – not all were formally identified by police – including at least 239 sex trafficking victims and at least 28 labor trafficking victims. Of the 772 potential victims, all were foreign nationals, including at least 15 asylum-seekers; at least six were children (four boys and two girls); at least 300 were women; and at least 14 were men. In 2024, police reported referring 83 sex trafficking victims to government assistance.

Gaps remained in victim identification; the government has not reported identifying any victims among asylum-seekers since 2022, and comparatively few children and Spanish nationals. The government reported screening migrants arriving in coastal regions for trafficking indicators in temporary reception centers; however, GRETA and NGOs expressed concern the government remained without an adequate system to identify trafficking victims among asylum-seekers and undocumented migrants, including in the Canary Islands, Ceuta, and Melilla. In the 2023 GRETA report, a study highlighted officials frequently classified cases with indicators of child trafficking under other crimes, lacked awareness regarding types of labor trafficking, and focused on organized crime over individual traffickers, resulting in the identification of few child victims. Victims identified by NGOs or other entities outside of law enforcement were not included in national statistics if victims did not wish to speak with police. According to civil society and GRETA, this, coupled with continued gaps in victim identification, resulted in probable underreported official victim statistics.

While the government did not have a formal NRM, it continued to utilize national victim identification and referral protocols. Fifteen of 17 autonomous communities employed their own

protocols for identification of trafficking victims, which they reportedly implemented simultaneously with the national protocol. The two autonomous communities without their own protocols continued to use the national protocol. However, NGOs reported officials across the country did not uniformly implement the protocols, especially for children, and protocols for asylum-seekers were inadequate; NGOs continued to advocate the government adopt a formal NRM. Furthermore, an NGO reported there were no official and systematic protocols for referral of victims to services, noting that some law enforcement officials did not contact civil society for victim assistance, and when they did, it was ad hoc. Identification and referral to services was especially inconsistent in areas where victims were not regularly identified, as not all front-line officials were adequately trained. The government reported formal victim identification was not tied to a victim's cooperation in criminal proceedings; however, in its 2023 report, GRETA concluded, in practice, formal identification was typically conditional on cooperation. Even if victims chose not to participate in criminal proceedings, officials required victims complete an interview with law enforcement to formally establish themselves as victims, which then entitled victims to specific benefits.

The government reported victims who chose not to participate in criminal proceedings had the same rights and access to victim assistance, including residence and work permits; NGOs confirmed they could provide certain assistance to trafficking victims outside the formal identification procedure. Victim interviewing for formal identification was usually coordinated with an NGO, which would subsequently assume care of the victim. NGOs often accompanied law enforcement on operations to provide assistance and information to identified victims. However, while NGOs could be present at interviews and operations, regional authorities noted NGOs were sometimes prohibited from interceding on the victim's behalf, including instances when police did not use victim-centered, trauma-informed approaches. Civil society and GRETA continued to advocate the government allow formal victim identification by entities other than law enforcement, including by NGOs, to allow unconditional access to assistance citing required law enforcement interaction could act as a deterrent to victims. A regional authority and several NGOs expressed concern law enforcement did not systematically provide victims with information on available assistance and protection; police relied predominantly on victim testimony instead of collecting corroborating evidence; and officials predominantly viewed trafficking as affecting foreign nationals, which could exclude Spanish nationals from official victim recognition and the associated protection services. The government passed Law 1155/2024 in November 2024, which aimed to address several of these issues by outlining mandatory reporting of potential trafficking victims and including requirements to inform victims of their rights and entitlements.

The government allocated €9.60 million (\$9.99 million) in subsidies to NGOs providing victim assistance to women and girls for sex trafficking and exploitation and allocated an additional €29.06 million (\$30.24 million) from the Camino plan (2022-2026) for identification, accreditation, and specialized comprehensive assistance for women and girls. This was a decrease compared with €9.51 million (\$9.90 million) in subsidies to NGOs and €38.11 million (\$39.65 million) allocated by the Camino plan in 2023. The government continued to implement a €12.94 million (\$13.47 million) project, funded through September 2024, focused on the social and labor reintegration of women who were victims of trafficking and sexual exploitation or were individuals in commercial sex. The government, through victim service offices, referred victims to government-funded NGOs that provided legal assistance, shelter, social welfare benefits, language training, psychological services, repatriation assistance, and full health care services through the national health system. Quality and availability of care varied by region; trafficking-specific victim services were not available in La Rioja, Ceuta, and Melilla. Government-funded NGOs reported assisting an estimated 6,967 potential victims in 2024, including at least 12 children and five Spanish nationals. This compared with government-funded NGO assistance provided to 6,769 potential victims in 2023. A government-funded NGO opened a new shelter for adult women victims of sex trafficking and other forms of exploitation in October 2024, while another NGO noted closing an emergency shelter for men and women labor trafficking victims in 2025 due to lack of resources. While receiving assistance in shelters, adult victims had freedom of movement but could not choose between shelter options due to limited availability; foreign victims could receive voluntary repatriation assistance. The national and regional governments had several specialized shelters for women and men trafficking victims throughout the country. The autonomous communities were

responsible for all child assistance and shelters; while there were no specialized trafficking shelters for children, they could be placed in specialized centers for child victims of all crimes and receive healthcare, psychological support, and education. The law required children's shelters to adopt protocols established by the child protection agency, to include prevention, early identification, and intervention measures for victims. However, NGOs reported the protocols were often implemented unevenly throughout the country due to lack of resources and adequate training. GRETA cited NGO reports stating unaccompanied migrant children in Ceuta and Melilla were vulnerable to trafficking in immigration detention centers and frequently disappeared from centers. In August 2024, a center for unaccompanied migrant children in the Canary Islands was closed following the indictment of its director and others for human trafficking and labor exploitation of the children at the center; the unaccompanied children were relocated to other centers in Spain. GRETA, NGOs, and government officials reported victim assistance, integration, and education services were predominantly available only for adult women sex trafficking victims. This resulted in very limited, if any, services and shelters available for children, men, and labor trafficking victims; officials reported difficulty locating assistance for these victims. Civil society and government officials reported there were insufficient shelters and resources for trafficking victims with disabilities, mental health illnesses, and addictions. Additionally, foreign national trafficking victims lacking legal status were unable to obtain many social services and victim entitlements, like stipends and compensation, because they were prohibited from opening bank accounts and registering with local authorities.

The law entitled victims to interpretation when speaking with officials, but civil society noted interpreters were not always sensitized to human trafficking or available for certain dialects. The law entitled victims to free legal aid and guaranteed legal assistance for all trafficking victims; however, the government has not updated the Framework Protocol for Protection of Victims of Trafficking to ensure legal aid was not contingent on a lack of sufficient economic resources. In its 2023 report, GRETA noted law enforcement agencies did not provide sufficient information to victims about their right to obtain free legal aid or how to access it and the practical application of legal aid was uneven across Spain, especially for undocumented migrants arriving in the Canary Islands, Ceuta, and Melilla. If a trafficking victim was in serious danger, their identity could remain anonymous during criminal proceedings; however, NGOs continued to report judges' inconsistent application of victim protections and called for legal reform to better protect witnesses by increasing measures to protect the identities of NGO expert witnesses. While the law entitled children to submit pre-recorded video testimony, it did not extend this protection to adults; NGOs and the Office of the Prosecutor continued to call for comprehensive legal reform to permit victims of all ages to testify via video conference, including using voice distortion, to prevent re-traumatization. Victims could be accompanied by NGOs, social workers, legal representatives, or psychologists to all interviews. The law required officials to ensure interviewing officials received specialized training, ensure the interview occurred at an appropriate venue, and minimize the number of times victims had to testify. GRETA and civil society noted not all protections for victims and witnesses were uniformly applied.

Law 1155/2024 required law enforcement to send the proposal for a 90-day recovery and reflection period to relevant government authorities within 48 hours of a potential trafficking victim being identified. The law automatically granted the recovery and reflection period if there were reasonable grounds to believe the person was a trafficking victim or if a decision was not made within five days (or within 24 hours if the potential victim was at a detention center). Law 1155/2024 further required relevant government officials to immediately cease deportation of potential victims. The government reported citizens of EU member states, however, were not limited to the 90-day reflection period and faced no deadline for claiming social services or cooperating with authorities. Law 1155/2024 mandated potential trafficking victims and qualified family members, determined to be exempt from liability, were automatically entitled to work permits – which allowed employment in any sector and location – and temporary residence permits, either for participating in criminal proceedings or based on their personal situation. If supported by a favorable report, provisional permits were granted immediately upon application submission and remained valid until a final decision was made; the final residence and work permit was valid for five years and could be renewed or used to apply for long-term residency. The government did not report comprehensive statistics on how many victims received residence permits or temporary protection.

The law required prosecutors to seek restitution from defendants during all criminal proceedings unless victims expressly waived that right. In 2024, courts granted at least 10 victims monetary restitution from convicted traffickers. However, NGOs and GRETA expressed concern regarding how few victims actually received awarded restitution and encouraged the government to confiscate trafficker's assets and increase training to officials. The government remained without a state compensation fund for trafficking victims; NGOs continued to advocate for establishment of such a fund. Law 4/2000 exempted victims from liability for unlawful acts committed as a direct result of being trafficked. Law 1155/2024, passed during the reporting period, reinforced the power of relevant government authorities to extend this exemption solely based on the victim's personal situation and without a requirement to cooperate with law enforcement. Government officials and civil society continued to express concern regarding the government's failure to identify any trafficking victims in the Canary Islands and reported that due to the lack of screening, the government did not take effective measures to prevent the inappropriate penalization of potential victims solely for unlawful acts committed as a direct result of being trafficked..

PREVENTION

The government maintained prevention efforts.

The national rapporteur, a politically appointed deputy ministerial position within the MOI, was responsible for coordination, analysis, and assessment of efforts across the government, with MOI's Center Against Terrorism and Organized Crime providing support and technical assistance. The rapporteur held two coordination meetings with NGOs and the interagency in 2024. Civil society reported the rapporteur and the government actively included NGOs and stakeholders in proceedings and coordination efforts, but some NGOs recommended an improved multidisciplinary approach. Despite the large scope of work, the rapporteur's office had limited staff, and the government did not report increasing resources. GRETA criticized the office of the rapporteur's ability to evaluate government efforts due to its prominent inter-ministerial coordination function and recommended the government create a fully independent evaluation body. At the regional and provincial level, the government had 17 regional delegates and 50 provincial deputy delegates who coordinated anti-trafficking efforts. In addition to the national rapporteur, the government also had an independent ombudsman responsible for reporting and advocating on behalf of trafficking victims. Furthermore, the government's "Delegation Against Gender-Based Violence" continued to play a central role in coordinating efforts pertaining to sex trafficking, including monitoring efforts on implementation and leading an interagency working group on sex trafficking and exploitation. The government reportedly continued to implement its expired 2021-2023 anti-trafficking NAP but did not report efforts to adopt an updated NAP. The government maintained its 2021-2024 labor trafficking NAP and began drafting an updated plan. The NAP focused on victim protection and improving government coordination and policies for the prevention and detection of labor trafficking, but it did not include a dedicated budget for implementation. Lastly, the government also had a sex trafficking and exploitation NAP (2022-2026) for women and girls, which primarily focused on prevention, victim identification, and assistance; this NAP included a substantial budget, a monitoring committee, responsible parties, specific timeframes, and concrete actions.

The government provided €1.716 million (\$1.786 million) in 2024 for trafficking awareness campaigns, prevention activities, and a study on sex trafficking and commercial sex, in addition to €11.66 million (\$12.13 million) for prevention and research activities allocated from the Camino plan (2022-2026) for women and girls. This was a slight decrease compared with €2.32 million (\$2.41 million) and an €11.66 million (\$12.13 million) allocation from the Camino plan in 2023. Federal and regional governments, the national rapporteur, and law enforcement, often in coordination with civil society, reported raising awareness through several extensive public awareness campaigns on various topics, including sex trafficking, online recruitment and exploitation, and sex trafficking in strawberry harvesting. Most awareness-raising material was available online for public access. Law enforcement supported a 24/7 hotline and an email address, which could be used to report all crimes, including suspected trafficking; the Ministry of Equality operated a 24/7 national hotline to report violence against women and girls. Additionally, at least

four government-funded NGOs operated trafficking-specific hotlines; in 2024, NGO hotlines received at least 3,397 calls, which led to the identification of at least 496 potential victims and 17 formally identified victims. Civil society recommended a nationwide trafficking-specific hotline, covering all forms of trafficking and in multiple languages, to improve coordination between law enforcement and NGOs and to facilitate communication with potential victims.

Fraudulent labor recruitment remained a concern. Foreign workers needed prior government permission before changing employers, which increased their vulnerability to trafficking. The law prohibited recruitment or job placement fees charged to foreign workers. However, some labor recruitment companies and intermediaries charged such fees, which increased vulnerability to trafficking through debt bondage. Labor officials expressed concerns that some companies subcontracted or illegally seconded employees to other companies, which increased workers' vulnerability to trafficking. The government lacked stringent licensing or accreditation requirements for labor recruiters to operate, aside from being subject to inspections for compliance and a mandate for a "responsible declaration." The government made efforts to hold labor recruiters accountable for fraudulent recruitment by arresting several suspected traffickers. Labor inspectors were required to alert law enforcement when they detected trafficking indicators during inspections, but victims could only be formally identified by law enforcement officers. Labor inspectors were unable to conduct unannounced inspections of domestic workers' accommodations and investigate allegations of abuse in the absence of an official complaint; given the large number of domestic and care workers in Spain, this created increased vulnerability and left some victims without protection. The labor inspectorate had a team of specialized inspectors stationed at the regional level; this network was responsible for coordinating with law enforcement and prosecutors and facilitating assistance to victims. In 2024, labor inspectors investigated 44 cases of labor exploitation and human trafficking by private employers or corporations; however, no cases were referred for prosecution. The government made efforts to reduce the demand for commercial sex acts through several public awareness campaigns against purchasing commercial sex.

TRAFFICKING PROFILE:

Trafficking affects all communities. This section summarizes government and civil society reporting on the nature and scope of trafficking over the past five years. Human traffickers exploit foreign victims in Spain and, to a lesser extent, Spanish victims in Spain and abroad. Spanish law neither permits nor prohibits commercial sex, and an October 2024 study estimated that in 2023, at least 114,576 adult women in Spain were in the commercial sex industry, and, of those, between 9,764 and 17,639 (8.5 to 15.5 percent) were sex trafficking victims. Civil society and experts estimate more than 80 percent of sex trafficking victims in Spain lack legal status. Young male traffickers use romance scams to coerce girls and women into sex trafficking, often using a faux romantic relationship as a means of manipulation or control. The use of private residences, instead of brothels or clubs, and online recruitment continues to increase. Traffickers increasingly use technology, including online platforms, social networks, mobile applications, live streaming, and the dark web to recruit and exploit victims and book apartment rentals to use as a venue for sex trafficking. Organized sex trafficking networks exploit women, primarily from South America, by fraudulently recruiting them for non-existent jobs and subsequently using drug addiction and debt bondage as a means of coercion. The rising numbers of migrants arriving by sea, especially departing from Mauritania, Morocco, and Senegal, including to the Canary Islands, are vulnerable to trafficking. Migrants from the Sahel region are vulnerable to trafficking in Spain. Unaccompanied migrant children continue to be vulnerable to sex trafficking and forced begging.

Labor traffickers exploit men and women in the textile, agricultural – especially cannabis cultivation – construction, industrial, restaurant, beauty, elder care, retail, deep sea fishing, and domestic work sectors. Refugees, predominantly women and children fleeing the Russia-Ukraine war, are vulnerable to trafficking. A 2023 NGO report indicated traffickers sometimes exploit sea fishers in forced labor aboard deep sea commercial fishing vessels owned by Spanish nationals or companies registered in Spain. Traffickers from Romania, Spain, Nicaragua, and Honduras often exploit family members in labor trafficking. Mafia groups run by Vietnamese and Chinese

nationals, often in collaboration with a local Spanish collaborator, increasingly exploit Vietnamese and Chinese victims in labor trafficking in agriculture and on cannabis plantations. Women from China are vulnerable to sex and labor trafficking. Fraudulent recruitment of migrant workers, especially from Morocco, increases vulnerability to labor trafficking in the agricultural sector, especially fruit farms. Romani girls are vulnerable to labor trafficking in Spain.