

FOURTH EVALUATION ROUND

Measures to prevent and detect vulnerabilities
to human trafficking

EVALUATION REPORT LATVIA

GRETA
Group of Experts
on Action against
Trafficking in Human Beings



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in Human Beings

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Secretariat of the Council of Europe Convention
on Action against Trafficking in Human Beings
(GRETA and Committee of the Parties)
Council of Europe
F-67075 Strasbourg Cedex
France

trafficking@coe.int

www.coe.int/en/web/anti-human-trafficking

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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 2021-2025, evaluates the measures taken by Latvia 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, the Latvian authorities have implemented a National Action Plan against THB for the period 2021-2023 and adopted a new plan for the period 2025-2027. There have been no changes to the legal framework for combating THB, but there are plans to develop a comprehensive law on the protection of victims of trafficking. The Ministry of the Interior continues to be responsible for the planning and co-ordination of national anti-trafficking policy. The report stresses the importance of reactivating the Inter-Institutional Working Group on Combating Human Trafficking and ensuring that it meets regularly and has a clear mandate.

The number of victims of trafficking identified in the period 2021-2024 was 149 (87 male and 62 female victims). Children represented 4% of all victims. Trafficking for the purpose of labour exploitation remained predominant, followed by sexual exploitation and exploitation through sham marriages. While the majority of the identified victims were Latvian nationals, there has been an increase in the number of identified foreign national victims.

The report highlights that children and young adults in or transitioning out of institutional care are particularly vulnerable to human trafficking in Latvia. GRETA considers that the Latvian authorities should strengthen the support available to such children and ensure its availability across municipalities. Further, with a view to preventing child trafficking, the authorities should continue to raise awareness of children, parents and caregivers of the risks of THB, including through the general school curriculum, and provide training on THB to all relevant professionals working with children.

GRETA also considers that the Latvian authorities should take further steps to counteract the risks of THB through initiatives aimed at eliminating sexual and gender stereotypes and reducing the risks of exploitation of women and girls in prostitution, including by raising awareness among them about the risks of human trafficking and the support services available to victims, developing exit programmes for those wishing to leave prostitution and adopting relevant legislation.

Increased demand for migrant workers, combined with limited resources of labour inspectors and law enforcement agencies, has heightened the risk of labour exploitation of third-country nationals. The report refers to different preventive measures, including awareness-raising campaigns and information leaflets. In addition, GRETA considers that the Latvian authorities should ensure that sufficient staff, resources and training are made available to the State Labour Inspectorate to enable it to contribute to the prevention and detection of THB for labour exploitation.

The number of asylum applications in Latvia has increased during the reporting period. In August 2021, a reinforced regime with restrictive measures was introduced at the Latvian-Belarusian border. According to NGOs and international organisations, pushbacks of migrants over the border with Belarus took place without assessing the risks individuals might face in Belarus, including human trafficking. GRETA asks the Latvian authorities to ensure that an individual vulnerability assessment is systematically carried out in respect of all persons detected at the Latvian-Belarusian border as well as those accommodated in asylum reception centres, and to provide further training on human trafficking to all relevant professionals involved in the asylum procedure. Further, GRETA urges the authorities to remedy the deficiencies in the care and protection of unaccompanied and separated children by ensuring the allocation of adequate resources to municipalities to provide individualised support and child-friendly services.

Further, GRETA considers that the Latvian authorities should continue strengthening the prevention of THB among the Roma community through sustained social, economic and other measures, as well as conduct targeted awareness raising within this community on the risks of THB and provide accessible information on safe migration, workers' rights and available support services, in co-operation with Roma mediators, civil society and community-based organisations.

To prevent the risks of trafficking of persons with disabilities, GRETA considers that the Latvian authorities should provide training on THB to all staff interacting with persons with disabilities and enhance their access to inclusive, community-based services adapted to their needs. Further, GRETA asks the authorities to guarantee adequate state-funded support for families with children with disabilities and to ensure that facilities and institutions accommodating persons with disabilities are adequately resourced and staffed to meet the needs of the beneficiaries and mitigate their exposure to the risks of trafficking.

Homeless people in Latvia, most of whom are men with severe substance use disorders or alcohol addiction, are frequently targeted for exploitation, including through forced begging, financial fraud schemes or to commit criminal activities. To prevent the trafficking of homeless people, GRETA asks the Latvian authorities to ensure that they are provided with secure accommodation and access to essential services.

A National Referral Mechanism (NRM) for the identification of victims of trafficking is still not formalised in Latvia. Identification as a victim of THB takes place either by decision of an investigator or a prosecutor as part of criminal proceedings, or by an assessment report of a multi-disciplinary commission if there is no criminal investigation or the victim does not wish to participate in criminal proceedings. During the reporting period, more victims were identified by the multi-disciplinary commission than by the police. However, the report highlights the need for enhanced outreach work, proactive victim identification and the recognition of indicators of sexual exploitation. GRETA urges the Latvian authorities to provide further training and guidance to law enforcement officials, social workers, health-care staff and other frontline professionals to ensure the timely identification of victims of trafficking and their referral to support services, regardless of whether criminal proceedings are initiated. The authorities should also strengthen the identification of child victims of THB by ensuring the effective use of specific indicators and adopting binding protocols for the identification of trafficking victims amongst unaccompanied and separated children. Further, GRETA considers that the authorities should put in place a procedure for the identification of victims of trafficking among irregular migrants and provide training on the identification of victims of trafficking amongst asylum seekers and detained migrants to all relevant professionals.

In Latvia, only officially identified victims of trafficking can receive state-funded assistance on the basis of a certificate confirming the identification by the police, prosecutor or the multi-disciplinary commission. The report notes that the duration of the victim rehabilitation programme, which is 180 days, is insufficient. GRETA once again urges the Latvian authorities to ensure that state funding for this programme is sufficient to cover the needs of all victims, including their access to appropriate and safe accommodation, for the duration necessary to achieve their recovery and regardless of the victim's willingness to co-operate in criminal proceedings. As regards child victims, GRETA asks the authorities to ensure the provision of adequate support and services tailored to their specific needs, with particular attention to unaccompanied and separated children. Further, GRETA considers that the Latvian authorities should provide safe and suitable accommodation for male victims of THB.

GRETA welcomes the application of the concept of "abuse of a position of vulnerability" in Latvian case-law on THB and invites the Latvian authorities to continue providing investigators, prosecutors and judges with training and guidance on recognising the existence or emergence of a victim's position of vulnerability, as well as understanding how such vulnerability may be exploited in the context of THB.

Following a 2022 reform, the Anti-Trafficking Unit of the State Police was assigned additional tasks without a corresponding increase in the number of investigators. Further, reorganisations of the Prosecutor's Office led to the dismantling of the Specialised Prosecutor's Office on Organised Crime and the resulting

lack of a central specialist team for THB cases. There is currently one senior prosecutor with expertise on THB appointed to provide guidance and expert support to first-instance prosecutors. GRETA urges the Latvian authorities to ensure that the Anti-trafficking Unit of the State Police has sufficient human and financial resources to investigate proactively THB cases and to improve co-operation between law enforcement bodies and specialised NGOs. GRETA also considers that the authorities should increase the number of specialised prosecutors assigned to THB cases and ensure that human trafficking offences are proactively and promptly investigated and lead to effective, proportionate and dissuasive sanctions for those convicted.

The report notes that traffickers often target and recruit victims via social media or fake job websites. The Safer Internet Centre reported a sharp rise in reported cases of online sexual exploitation of children and the dissemination of grooming-related material. In September 2024, to operationalise the National Cybersecurity Strategy for 2023-2026, Latvia enacted the National Cybersecurity Law. A series of awareness-raising campaigns on online exploitation risks have been conducted. While welcoming these efforts, GRETA considers that the Latvian authorities should develop further measures specifically aimed at preventing ICT-facilitated THB, including investing in capacity building and digital tools to conduct proactive investigations on trafficking cases. In this context, there is a need for targeted training on THB for the Cybercrime Prevention Board, to enhance their ability to detect and respond effectively to technology-facilitated forms of exploitation.

In 2021-2024, state compensation was awarded to 33 victims of THB. While noting positively the increase in the number of victims that were awarded state compensation, GRETA once again urges the Latvian authorities to enable all victims of trafficking to effectively exercise their right to compensation from the perpetrators in criminal proceedings, including by making full use of the legislation on the freezing and forfeiture of assets and ensuring that recoverable property which is seized in criminal proceedings is returned as soon as possible to the victim or used to compensate the victim. Further, GRETA considers that the authorities should continue providing training on the topic of compensation to lawyers, prosecutors and the judiciary and ensure the systematic recording of data concerning compensation awarded to victims of THB by court decisions.

Pursuant to the Law on Residence of Victims of Trafficking in Human Beings, the recovery and reflection period is limited to third-country nationals who have no legal basis to reside in Latvia with a view to preventing their expulsion. During the reporting period, nine victims of THB were granted a recovery and reflection period. GRETA once again urges the Latvian authorities to review the legal provisions in order to ensure that all possible foreign victims of trafficking, including EU and EEA citizens, are effectively offered a recovery and reflection period and all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention during this period.

Finally, while welcoming recent amendments to the Criminal Procedure Law concerning the questioning of child victims, GRETA considers that the Latvian authorities should ensure that, in practice, the best interests of the child are the primary consideration in all proceedings relating to child victims of THB and to avoid, as far as possible, the repeated summoning of child victims of THB.

General information on trafficking in human beings in Latvia (covering the period from 2021 until November 2025)

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| Entry into force of the Council of Europe Convention on Action against Trafficking in Human Beings | 1 July 2008 |
| Previous evaluations by GRETA | <ul style="list-style-type: none"> • First evaluation report (published on 31 January 2013) • Second evaluation report (published on 23 March 2017) • Third evaluation report (published on 21 February 2022) |
| Co-ordination of national action against THB | <ul style="list-style-type: none"> • National Anti-Trafficking Co-ordinator (within the Ministry of the Interior) • Inter-institutional Working Group on Combating Human Trafficking (until 2023) |
| National Rapporteur on THB | <ul style="list-style-type: none"> • The National Anti-Trafficking Co-ordinator assumes the tasks of the National Rapporteur (equivalent mechanism) |
| Specialised bodies and NGOs | <ul style="list-style-type: none"> • State Police Anti-Trafficking Unit • NGOs: Centre MARTA and Shelter "Safe House" |
| National Strategy/Action Plan | <ul style="list-style-type: none"> • National Action Plan against Trafficking in Human Beings (2021-2023) • National Action Plan against Trafficking in Human Beings (2025-2027) |
| Relevant legislation | <ul style="list-style-type: none"> • Criminal Law (Sections 154¹ and 154²) • Law on Residence of Victims of Trafficking in Human Beings in the Republic of Latvia, adopted on 25 January 2007 (Immigration Law) • Law on Social Services and Social Assistance • Law on State Compensation to Crime Victims • Criminal Procedure Law (Sections 350 to 353 related to the compensation for victims of criminal offences) • Criminal Law (Section 58, paragraph 6) and Criminal Procedure Law (Section 379, paragraph 5) related to the non-punishment of victims of THB • Cabinet Regulation No. 344 of 16 July 2019 "Regarding the Procedures by which Victims of Trafficking in Human Beings Receive Social Rehabilitation Services, and the Criteria for the Recognition of a Person as a Victim of Trafficking in Human Beings" • Cabinet Regulation No. 1493 of 22 December 2009 "Regulations Regarding the Amount of State-ensured Legal Aid, the Amount of Payment, Reimbursable Expenses and the Procedures for Payment Thereof" • Cabinet Regulation No. 564 of 21 June 2010 "Regulations Regarding Residence Permits" • Law on Immigration of 31 October 2002 • Law on Asylum of 18 December 2015 |
| National Referral Mechanism (NRM) | The NRM has not been formalised. |
| Trafficking profile | Latvia is primarily a country of origin of victims of trafficking but is increasingly becoming also as a country of destination and transit. The majority of identified victims were subjected to labour exploitation, followed by sexual exploitation and exploitation through sham marriages. Most of the victims were male. The majority of the victims were Latvian nationals. |

I. Introduction

1. Latvia was amongst the first countries to ratify the Council of Europe Convention on Action against Trafficking in Human Beings ("the Convention"), on 1 July 2008. Over the years, the Latvian authorities have taken a number of steps to develop the legislative, institutional and policy framework for action against trafficking in human beings (THB) in the light of the obligations under the Convention. This includes amendments to the Criminal Law (CL) and the Administrative Violations Code with a view to complying with provisions of the Convention. National action plans against THB have been periodically adopted, and an Inter-Institutional Working Group on Combating Trafficking in Human Beings was set up to co-ordinate the activities of government agencies, municipal authorities and NGOs. Further, a specialised anti-trafficking unit was established within the State Police. Moreover, a multi-disciplinary commission of experts was set up to identify victims of trafficking. However, after three rounds of evaluation, GRETA concluded that there were continuing gaps in certain areas, such as the provision of assistance to victims of trafficking, the granting of a recovery and reflection period, victims' access to compensation, and the investigation and prosecution of human trafficking offences.

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

3. On 21 October 2024, GRETA launched the fourth round of evaluation of the Convention in respect of Latvia by sending the questionnaire for this round to the Latvian authorities. The deadline for submitting the reply to the questionnaire was 21 February 2025 and the authorities' reply was received on 18 February 2025.

4. GRETA carried out an evaluation visit to Latvia from 7 to 11 April 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:

- Ms Antoaneta Vassileva, First Vice-President of GRETA;
- Mr Luka Maderić, Second Vice-President of GRETA;
- Ms Teresa Armengol, Administrator in the Secretariat of the Convention.

5. During the visit, the GRETA delegation met Mr Jānis Bekmanis, Deputy State Secretary of the Ministry of the Interior, Ms Beate **Barkāne-Iļjenkova**, Head of the Office of the Minister of the Interior, and Ms Agnese **Zīle**, National Anti-Trafficking Co-ordinator. Meetings were also held with representatives of the Ministry of Justice, the Ministry of Welfare, the Ministry of Culture, Ministry of Education and Science, the Ministry of Health, and the Ministry of Foreign Affairs. Further, the delegation met officials from the State Police, the State Border Guard, the Office of Citizenship and Migration Affairs, the State Labour Inspectorate, the State Employment Agency, the Financial Intelligence Unit, the Child Protection Centre, the Social Integration Foundation, the General Prosecutor's Office, the Court Administration, the Justice Academy, and a judge from the Supreme Court. Meetings were also held with Members of Parliament and the Ombudsman's Office. In addition, the GRETA delegation met representatives of Riga Municipality's Welfare Department and Riga's Orphan's and Custody Court, as well as the local social services and Orphan's and Custody Court in Ropāži.

² <https://rm.coe.int/report-submitted-by-the-authorities-of-latvia-on-measures-taken-to-com/1680b2bd69>

6. The GRETA delegation held separate meetings with representatives of non-governmental organisations (NGOs) and trade unions. Discussions were also held with representatives of the International Organization for Migration (IOM) and the United Nations High Commissioner for Refugees (UNHCR).

7. In the course of the visit, the delegation visited the “Lighthouse Transition Care” centre for young people leaving foster care, a day centre for refugees and homeless persons, and a crisis centre for families and children operated by the Salvation Army in Riga. Further, GRETA visited an asylum reception centre and the immigration detention centre in Mucenieki.

8. The list of the national authorities, 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.

9. GRETA wishes to place on record the co-operation provided by the Latvian authorities and in particular by the contact person appointed to liaise with GRETA, Ms Agnese **Zile**, National Anti-Trafficking Co-ordinator.

10. The draft version of the present report was approved by GRETA at its 54th meeting (30 June – 4 July 2025) and was submitted to the Latvian authorities for comments. The authorities’ comments were received on 21 October 2025 and were taken into account by GRETA when adopting the final report at its 55th meeting (17-21 November 2025). The report covers the situation up to 21 November 2025; 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

11. Latvia remains primarily a country of origin of victims of trafficking in human beings (THB), but is increasingly becoming also a country of destination and transit. The total number of identified victims of THB in the period 2021-2024 was 149 (61 in 2021, 26 in 2022, 24 in 2023 and 38 in 2024), representing an increase of 39% compared to the previous reporting period³ (see detailed statistics in the table in Appendix 1). Of the identified victims, 87 were male and 62 female. There were only 6 identified child victims (two girls trafficked for the purpose of sexual exploitation, in 2022 and 2023, and two girls and two boys exploited in forced begging in 2024). Trafficking for the purpose of labour exploitation remained predominant (63% of the victims), followed by sexual exploitation (15%) and exploitation through sham marriages (6%). Latvian nationals accounted for 77% of the victims. Amongst the 34 foreign national victims, the most represented nationalities were Tajikistan (14), Belarus (3), India (3), Uzbekistan (3) and Cameroon (2).

12. As regards emerging trends in THB, the authorities have indicated that Latvia is undergoing a period of transition - while previously Latvian nationals were primarily subjected to exploitation abroad, currently they are also exploited within Latvia and there is an increasing number of foreign nationals trafficked to Latvia. As a result, many established policies and practices - such as approaches to risk environments, victim identification and referral, and victim assistance - must be modified or adapted. Further, traffickers increasingly rely on psychological means of control rather than physical violence, which makes it more difficult to identify victims and prosecute the offenders.

13. There have been no new developments in the legislative framework for combating THB in Latvia since GRETA's third evaluation. There are plans to develop a comprehensive law on the protection of victims of trafficking, which will be supplemented by a Cabinet Regulation describing the procedures and responsibilities of relevant institutions. According to the authorities, the role of NGOs providing assistance services to victims of THB will be strengthened in the new law. While the Convention does not oblige State Parties to include the rights and measures to protect victims of trafficking in a single law, GRETA sees an added value in adopting such an approach, notably by giving more visibility to the issue, facilitating the work of professionals and ultimately improving the protection of victims.

14. As regards the institutional framework for anti-trafficking action, the Ministry of the Interior continues to be responsible for planning and co-ordinating national anti-trafficking policy and an official of the Ministry has been designated as the National Anti-Trafficking Co-ordinator. This official performs a range of tasks, including ensuring the functioning of the national anti-trafficking co-ordination mechanism and co-ordinating the implementation of its decisions, representing the Ministry of the Interior and Latvia at relevant meetings at national and international level, as well as work on drafting of the new comprehensive law on THB and the preparation of the new National Action Plan. She also acts as National Rapporteur on THB (see paragraph 16) and is responsible for the collection and analysis of information and trends of THB. While welcoming the work carried out by the National Anti-Trafficking Co-ordinator, GRETA considers that the Latvian authorities should increase the human resources to enable the carrying out of the range of tasks involved and strengthen the co-ordination of national anti-trafficking action.

³ The total number of identified victims in the previous reporting period was 106 (19 in 2016, 25 in 2017, 23 in 2018, and 39 in 2019)

15. The Inter-Institutional Working Group on Combating Human Trafficking⁴ was operational until 2023, but no meetings have taken place since. The authorities reported the organisation of bilateral or thematic meetings between some institutions. GRETA considers that the Latvian authorities should reactivate the Inter-Institutional Working Group on Combating Human Trafficking and ensure that it meets regularly and is given a clear mandate to support strategic decision-making and co-ordination.

16. As noted in GRETA's third report,⁵ the National Co-ordinator also assumes the role of National Rapporteur on THB. The possibility of the Ombudsman's Office fulfilling this role has been discussed, but as this would require additional funding (a minimum of EUR 50,000 yearly), no decision has been taken. Recalling its position on the need for a structural separation between monitoring and executive functions in order to have an objective evaluation of anti-trafficking law, policy and practice, identification of lacunae and shortcomings, and the formulation of comprehensive legal and policy recommendations, GRETA considers that the Latvian authorities should designate as a National Rapporteur a separate organisational entity or another independent mechanism for monitoring the anti-trafficking activities of State institutions, supported by sustainable funding to guarantee its long-term effectiveness and autonomy.

17. Following the conclusion of the National Action Plan (NAP) against Trafficking in Human Beings for the period 2021-2023, there has been an absence of a dedicated policy document. At the time of GRETA's visit in April 2025, the preparation of a new NAP for the period 2025-2027 was underway. The two main NGOs providing assistance to victims of THB, Shelter "Safe House" and Centre MARTA, were involved in the drafting process. The new NAP was adopted on 26 August 2025.⁶ It includes an analysis of the situation and trends of THB in Latvia, referring to risks and vulnerabilities. The NAP is structured into four action areas: i) prevention; ii) victim support (identification, referral and service provision); iii) strengthening the detection, investigation, prosecution and trial of offences; and iv) co-ordination policy. It contains a total of 12 activities/measures, with an indication of the expected results, performance indicators, responsible institution, implementing bodies and deadline for implementation. GRETA welcomes the adoption of the new National Action Plan against THB.

18. GRETA was informed that the National Co-ordinator conducted an evaluation of the implementation of the NAP for 2021-2023 as no resources were available to pay for an independent evaluation. GRETA considers that the authorities should commission independent evaluations of National Action Plans against Trafficking in Human Beings as a tool for assessing the impact of the activities and for planning future policies and measures to combat THB.

⁴ See GRETA's third evaluation report on Latvia, paragraph 17.

⁵ See GRETA's third evaluation report on Latvia, paragraph 18.

⁶ <https://likumi.lv/ta/id/362691-par-cilveku-tirdzniecibas-noversanas-planu-20252027-gadam>

III. Addressing vulnerabilities to trafficking in human beings

1. Prevention of trafficking in human beings

a. Introduction

19. 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 Parties to adopt measures to discourage the demand that fosters all forms of exploitation of persons which leads to trafficking.

20. The Latvian authorities indicated that migrant workers (particularly men from Tajikistan, Uzbekistan, Kyrgyzstan, Moldova, Belarus, Ukraine and India) who arrive in Latvia for employment in construction, agriculture, food processing and catering are at heightened risk of labour exploitation. Among Latvian nationals, two groups are identified as particularly vulnerable to THB: those who migrate for work abroad, mainly to other EU countries, and persons affected by substance abuse, homelessness or extreme socio-economic deprivation. The latter group, which includes children, is targeted for forced begging or drawn into financial fraud schemes abroad. Further, children and young adults placed in or transitioning from institutional care represent a group at heightened risk of THB. Girls and women are targeted for sexual exploitation through fraudulent job offers in modelling or entertainment.

21. The two main NGOs providing assistance to victims of THB, Shelter "Safe House" and Centre MARTA, have implemented several research projects and published reports and handbooks on the prevention of THB. The NGO Centre MARTA conducted research on child trafficking, publishing two reports: one in March 2022 on improving support services for trafficked children,⁷ and another on the prevalence of sexually abusive behaviour in Latvian schools.⁸ In addition, in 2022, the Centre MARTA published the report "Notice the difference" which analysed the needs for support of women victims of trafficking for sexual exploitation from third countries across, as part of the EU-funded project "COALESCE" which covered six EU member states, including Latvia.⁹ Further, the Shelter "Safe House" implemented, together with NGOs from Lithuania, the project "They Have a Name", focusing on human trafficking prevention policies in the Baltic Sea region.¹⁰

⁷ https://marta.lv/files/research/MARTA_report_final_THB_LV.pdf

⁸ https://marta.lv/files/research/Research%20report_sexually%20abusive%20behaviour%20in%20Latvian%20schools_2020.pdf

⁹ https://marta.lv/files/research/COALESCE_Zinojums_pamani_atkiribu_MARTA_LV.pdf

¹⁰ The project produced the report "Combating THB: Report of the Experts Group on THB. A Baltic Sea States Edition", available at: https://patverums-dm.lv/svs/uploads/files/Final_E_booklet_compressed.pdf

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

i. *Children and young people*

22. GRETA's second report on Latvia paid particular attention to measures taken to prevent trafficking in children, focusing on relevant legislation, awareness-raising among children and young people, and the registration of all children at birth as a prevention measure against trafficking.¹¹

23. The Ombudsman's Office has continued delivering the school programme "Ready for Life", conducting lectures on THB to children in order to raise awareness of its different forms, develop skills to recognise risks and inform them of the available rights protection mechanisms. A total of 58 lectures were conducted (32 in 2021,¹² 5 in 2022,¹³ 9 in 2023¹⁴ and 12 in 2024). Awareness of THB has also been provided to children and young people through the projects "Hear, See, Live" and "Education and Information as Tools to Prevent Trafficking in Human Beings!".

24. Since 2024, the Latvian government has mandated all schools to implement the violence prevention programme KiVa, aimed at raising pupils' awareness of violence and strengthening their protective skills. At the time of GRETA's visit in April 2025, 176 educational institutions were involved in this programme. However, THB is not part of it. The general school curriculum does not include THB but covers issues such as internet safety and cyberbullying.

25. In November 2024, a public information campaign "Conversation Protects" was launched, including short videos aimed at parents, emphasising the importance of open conversations with children regarding sex education.

26. The Centre Dardedze organised the programme "Jimba Security School"¹⁵ for children aged 5-11 with the aim of educating them about relationships, thereby reducing the risks of violence, including THB. As part of the programme, complex issues are explained to children through music, toys, films and role-playing games. In 2024, with the financial support of the Ministry of Welfare, 4,551 children participated in this programme.

27. The Support Services Department of the Child Protection Centre implements the project "Support for Children with Behavioural or Addiction Problems and Their Families", funded by the European Social Fund, running from December 2023 to December 2029, to facilitate the early identification of risks related to behavioural or addiction issues in children and to ensure the prompt and effective delivery of services and support. The project will help identify risk groups and provide support to children who can be considered at high risk for THB. Moreover, the Support Services Department is responsible for the implementation of the project "Fostering a Family-Friendly Environment and Society and Enhancing Psychological and Emotional Resilience through Targeted Interventions" which aims at providing a supportive environment, strengthening healthy social relations, and creating support systems which can play a role in preventing THB.

28. The telephone helpline for children 116 111, operated by the Child Protection Centre and financially supported by the Ministry of Welfare, offers guidance and support to children, parents and educators on digital safety and cyber threats. It has received only one call concerning a possible case of THB, in May 2024. Helpline staff received online training on THB on 11 June 2025 (for 112 participants), with further sessions scheduled for 19 November 2025 and in 2026. A guideline "Signs that May Indicate a Child is a

¹¹ See GRETA's second report on Latvia, paragraphs 66-74.

¹² <https://www.tiesibsargs.lv/wp-content/uploads/2022/07/Annual-Report-2021.pdf>, page 180.

¹³ https://www.tiesibsargs.lv/wp-content/uploads/2023/08/ombudsman_2022_annual_report.pdf, page 78.

¹⁴ https://www.tiesibsargs.lv/wp-content/uploads/2024/07/ombudsman_2023_annual_report.pdf, page 85.

¹⁵ <https://dzimba.lv/>

Victim of Human Trafficking",¹⁶ which is available to all institutions working with children, including the helpline, was prepared by the Child Protection Centre.

29. The number of children in out-of-family care was 5,341 in 2024 ((3,352 children under guardianship,¹⁷ 1,403 living in foster families¹⁸ and 586 living in long-term social care and rehabilitation institutions).¹⁹ Recognising the heightened risk of children and young adults in out-of-family care being targeted by traffickers, in 2022, the Ombudsman's Office launched a new initiative on educating children and staff in childcare facilities about the risks of THB.²⁰ Following this initiative, in 2022 and 2023, lectures were given in 18 non-family care institutions to help children and caregivers recognise the risks associated with trafficking. Some 140 children (aged 13-14) participated.²¹ Additionally, two online lectures were given to some 70 staff members about the risks of THB.²²

30. The Orphan's and Custody Courts Supervision Department conducts inspections of child residential institutions and foster families, to ensure that the environment is safe and suitable for children. The number of foster families has gradually decreased (from 600 recorded in 2021, to 537 in 2024).²³

31. In 2024, the functions of the State Inspectorate for Protection of Children's Rights were reorganised and the institution was renamed the Child Protection Centre (CPC).²⁴ In 2025, the CPC established a dedicated position of senior expert on THB tasked with providing methodological support, advancing prevention initiatives, and delivering targeted training to CPC staff.

32. During the visit, Members of the Latvian Parliament noted that children leaving institutions are particularly vulnerable due to the absence of a standardised national assistance framework. The limited support available is predominantly provided by volunteers, municipalities and non-governmental initiatives. In their comments on the draft GRETA report, the Latvian authorities indicated that in May 2024, the support measures for children transitioning out of institutional care were expanded through amendments to the Social Services and Social Assistance Act and the regulations governing social guarantees for orphans and children in out-of-family care. The amendments extended support up to 21 years of age - or 24 years for young people continuing education. New or expanded measures include social mento support (up to three hours weekly), participation in social and life skills building groups and a daily allowance for financial literacy training. Young people may continue living with former caregivers after reaching adulthood under supportive arrangements. The amendments further clarify the issuance of social guarantee certificates and related benefits. Municipalities must assess the individual needs of each youth and may provide additional support. For example, Riga municipality has established a Youth Support Centre which provides support to children in transition and close to transition (age 16-24).

¹⁶ https://www.bac.gov.lv/lv/jaunums/pazimes-kas-var-liecinat-ka-berns-ir-cilveku-tirdzniecibas-upuris?utm_source=https%3A%2F%2Fwww.google.com%2F

¹⁷ Families where a legal guardian has been appointed to a child, usually by court decision, typically when the biological parents are unable to fulfil their responsibilities over the long term.

¹⁸ Families who temporarily care for children placed with them by the child protection services, usually while efforts are made to reunite the child with the biological family or to find a permanent solution.

¹⁹ <https://stat.gov.lv/lv/statistikas-temas/soc-aizsardziba-veseliba/aizgadniba-arpusgimenes-aprupe/12449-arpusgimenes-aprupe?themeCode=AA>

²⁰ https://www.tiesibsargs.lv/wp-content/uploads/2023/08/ombudsman_2022_annual_report.pdf, page 79.

²¹ https://www.tiesibsargs.lv/wp-content/uploads/2024/07/ombudsman_2023_annual_report.pdf, page 85.

²² https://www.tiesibsargs.lv/wp-content/uploads/2024/07/ombudsman_2023_annual_report.pdf, page 85.

²³ https://data.stat.gov.lv/pxweb/lv/OSP_PUB/START__VES__AA__AAG/AAG030/table/tableViewLayout1/

²⁴ The CPC is subordinated to the Ministry of Welfare and is responsible for monitoring compliance of child protection institutions with legal standards, ensuring systemic accountability, and initiating corrective measures where children's rights are at risk. Its role is different from that of the Orphan's and Custody Courts Supervision Department, which operates at the municipal level, dealing directly with individual cases related to guardianship, custody decisions, and the supervision or removal of legal guardians.

33. According to the CPC, in 2021, seven unaccompanied foreign children were placed with guardian families and one in a long-term social care and rehabilitation institution. In 2022, 22 unaccompanied children were identified, including 19 who sought asylum; 11 were placed with guardian families, one in long-term care, one in a foster family and nine were accommodated in centres for asylum seekers or detained foreigners, with their interests being represented by the Orphan's Court. In 2023, 65 unaccompanied children were identified; out-of-family care was provided to 10 asylum-seeking children (nine under guardianship and one in a foster family), one child granted refugee status was placed in a foster family and 54 children were accommodated in centres for asylum seekers or detained foreigners (see also paragraph 111 and the recommendation in paragraph 112). In 2024, eight unaccompanied children were registered, of whom four were placed with guardian families, three with foster families, and one in a long-term care and rehabilitation institution.²⁵

34. In their comments on the draft GRETA report, the Latvian authorities indicated that in April 2025, amendments were made to Cabinet of Ministers Regulation No. 352 of 20 June 2017²⁶ to include sections 2.2.4 "number of asylum seekers accommodated in an asylum seeker accommodation centre by decision of the Orphan's Court" and 2.2.5 "number of asylum seekers who, based on a border guard or court decision, are staying in a detention centre for detained foreigners." According to the authorities, these additions will ensure more precise data collection that will allow to obtain information on the placement of unaccompanied children.

35. As regards training to various professionals, employees of the Ombudsman's Office provided training to police officers, prosecutors, judges, lawyers and psychologists on the topic "Child Victims of Trafficking in Human Beings". A total of 35 lectures were conducted (21 in 2022 and 14 in 2023). Training was also held for representatives of state and municipal institutions, with some 500 attending. The lectures provided officials with knowledge of the legal framework concerning human trafficking, indicators and risk factors for both victims and offenders, inter-institutional collaboration, and services available to victims. Further, in 2023-2024, the CPC organised a series of seminars for employees of the Orphan's and Custody Court (a total of 80 employees participated in 2023 and 150 employees in 2024) on "Basic Principles of Conversations with Children in Assessing Cases of Neglect and Violence by Parents or Legal Representatives."²⁷ Moreover, experts from the Safer Internet Centre provided professional input for the development of methodological materials of the CPC, such as the creation of a Sexual Behaviour Assessment Tool, which also addresses aspects of online safety. In addition, the Centre MARTA organised a workshop for law enforcement officers to address challenges in identifying child victims and the obstacles that hinder effective referrals for assistance and rehabilitation. In addition, in January 2025, Riga Municipality organised a training session on THB, attended by 42 participants, including social mentors of children in transition.

36. GRETA considers that the Latvian authorities should take further steps to reduce the vulnerability of children to human trafficking, including by:

- increasing their efforts to prevent trafficking of children transitioning out of institutional care by strengthening the support provided to them and ensuring that it is available across municipalities;
- continuing to raise awareness of children, parents and caregivers of the risks of human trafficking (including recruitment and abuse through Internet/social networks), paying particular attention to children in vulnerable situations, including children living in or transitioning from residential care;

²⁵ <https://stat.gov.lv/lv/statistikas-temas/iedzivotaji/patveruma-mekletaji/tabulas/pmn010-nepilngadigas-personas-bez?themeCode=PMN>

²⁶ Regulations on the sample official statistics form in the field of activity of the Orphan's Court and the procedure for filling out and submitting the form, available at: <https://likumi.lv/ta/id/291866>

²⁷ Over the course of one day, the seminars covered topics such as: fundamental principles of conversing with children, engaging with children about legally significant events, and techniques for conversing with children of different age groups.

- mainstreaming the prevention of child trafficking by including it in the general school curriculum;
- continuing to provide training on trafficking in human beings to all relevant professionals working with children, including teachers, employees of the Orphan's and Custody Courts, staff of child residential institutions and 116111 helpline staff.

ii. Vulnerabilities related to the gender dimension of human trafficking

37. The gender dimension of THB evident from the trends of THB mentioned in paragraph 11 underscores the need to ensure that anti-trafficking policies and actions integrate a gender-sensitive approach.

38. The Ministry of Welfare's Department of Social Policy Planning and Development is the main co-ordinating body for the promotion of gender equality in Latvia. It oversees the implementation of gender mainstreaming strategies, conducts gender impact assessments, and collaborates with other ministries, municipalities, and civil society organisations to advance gender equality. Furthermore, the Ombudsman monitors compliance with anti-discrimination laws, providing consultations, and reviewing complaints related to gender-based discrimination.

39. In January 2024 Latvia ratified the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence ("Istanbul Convention"). Latvia has an Action Plan for the Prevention and Combating of Violence against Women and Domestic Violence,²⁸ covering the period 2024-2029, which aims to develop an integrated, targeted and effective policy to prevent and reduce violence against women and domestic violence. Measure 9.1. of the Action Plan envisages the development of guidelines and algorithms for action in cases of domestic violence, sexual exploitation or THB, in order to ensure a common approach.

40. Prostitution is legal in Latvia and is regulated by Cabinet Regulation No. 32 of 22 January 2008 regarding the restriction of prostitution.²⁹ In 2020, the Administrative Violations Code was repealed and administrative violations were transferred to the relevant sectoral laws. However, as the draft law on the restriction of prostitution remains pending due to a lack of political consensus and deeply polarised stakeholder views,³⁰ administrative violations related to prostitution were left unregulated. According to the State Police, the suspension of administrative sanctions and the absence of dedicated legislation on prostitution hinder the identification and investigation of pimping and trafficking for the purpose of sexual exploitation.

41. In 2024 and 2025, the Centre MARTA, in co-operation with the Court Administration, organised a training course for some 30 law enforcement officials covering gender-based violence and THB, with an emphasis on victim-friendly approaches to handling cases.

42. GRETA was not informed of any measures specifically aimed at addressing the vulnerability of LGBTI+ persons to trafficking in human beings. According to information received from specialised NGOs, one identified victim of THB for the purpose of sexual exploitation was a gay man suffering from a mental disorder, who had been exploited on multiple occasions and, due to his inability to live independently, was placed in several institutions across Latvia. NGOs reported that the victim faced discrimination from

²⁸ Available at: <https://likumi.lv/ta/id/357535-vardarbibas-pret-sievieti-un-vardarbibas-gimene-noversanas-un-apkarosanas-plans-20242029-gadam>

²⁹ See GRETA's third report, paragraph 169 and GRETA's second report, paragraph 127.

³⁰ The legal package and results of the public discussion (in Latvian) are available at: https://tapportals.mk.gov.lv/legal_acts/d3737db8-9bb4-4813-bb44-7897427e1576, accessed on 12 May 2025.

other residents and, at times, from staff of the institutions where he was placed, primarily because of his sexual orientation.

43. While welcoming the measures taken to advance gender equality, GRETA considers that the Latvian authorities should take further steps to prevent THB through initiatives aimed at eliminating sexual and gender stereotypes and reducing the risks of exploitation of women and girls in prostitution, including by raising awareness among them about the risks of human trafficking and the support services available to victims, developing exit programmes for those wishing to leave prostitution, and adopting relevant legislation.

iii. Migrant workers

44. As noted in paragraph 11, labour exploitation is the predominant form of exploitation of victims of THB identified in Latvia. According to trade unions, the significant emigration of Latvian citizens and an ageing population have led to increased demand for migrant workers. Combined with limited resources of labour inspectors and law enforcement agencies, this has heightened the risk of labour exploitation of third-country nationals. Human trafficking also affects Latvian nationals seeking employment abroad.

45. Pursuant to Section 23, paragraph 7, of the Immigration Law, a third-country national with irregular residence in Latvia who has been illegally employed in particularly exploitative working conditions³¹ or a third-country national child who has been illegally employed in Latvia have the right to request a temporary residence permit if they have made an application for recovering unpaid wages to a court. The permit may be renewed if the legal proceedings are ongoing or the wages remain unpaid.

46. To prevent labour exploitation, in 2022, 2023 and 2024, the Ministry of Foreign Affairs and the Ministry of the Interior conducted jointly the awareness-raising campaigns "Don't let yourself be taken advantage of" and "Working abroad. Critically assess tempting offers". Information materials (brochures and posters) with emergency contact numbers were disseminated via websites and social media, with support from the Latvian Association of Local Governments and the State Employment Agency. In co-operation with the Visual Media Group and Media Port Riga, an informative video was displayed on screens in Riga public transport and at Riga International Airport.

47. In 2020-2021, the Shelter "Safe House" implemented the project "Prevention measures to reduce work exploitation" which researched the rehabilitation of victims of labour exploitation. The study found gaps in the legal definitions, difficulties in detecting transnational labour exploitation, and barriers to access to justice for third-country nationals. The project recommended mandatory labour rights integration courses for foreign workers, to be implemented by the State Labour Inspectorate, the State Employment Agency, NGOs and other stakeholders.

48. In 2023, the Ombudsman, in co-operation with the Ministry of the Interior and the Procurement Monitoring Bureau, began developing guidelines to prevent THB and labour exploitation in public procurement, which have been finalised and are soon to be published.

49. Given the increase in third-country nationals arriving in Latvia to work and their vulnerability to exploitation, Latvian embassies abroad use an information leaflet to inform migrants about their rights and obligations related to the entry, stay and employment in Latvia. It includes guidance on how to submit complaints regarding any violations by the employer and where to seek assistance. This information is provided to each seasonal visa applicant following a positive visa decision. Based on regional trends and the volume of visa applications from foreign nationals, the leaflet is available in English, Russian and

³¹ According to the same Section, "Particularly exploitative working conditions are such working conditions and employment requirements which cause very incommensurate differences between the working conditions and employment requirements of legally employed workers and the working conditions and employment requirements of such foreigner who is staying illegally in the Republic of Latvia, as well as differences due to gender discrimination or another type of discrimination, or differences that affect the protection of health and safety of the foreigner at work, as well as violates his or her dignity" (unofficial translation).

Uzbek. In 2024, Latvian diplomatic and consular missions issued 8,997 work visas, mostly to nationals of Kazakhstan and Uzbekistan. As part of the visa issuance process, consular officers verify facts, conduct interviews and carry out checks in co-operation with the State Border Guard (SBG).

50. Consular staff met during the visit indicated that they receive requests from Latvian nationals who have fallen victim to fake job offers abroad and seek assistance to return home.³² In such cases, the relevant authorities in Latvia (including the Office of Citizenship and Migration Affairs, the State Police and the Labour Inspectorate) were reportedly contacted without delay.

51. As explained in previous GRETA reports, the State Labour Inspectorate monitors compliance with labour conditions, occupational safety and health standards. At the time of the visit, 106 labour inspectors were employed in the country, divided into five regions. The authorities acknowledge that the Inspectorate lacks sufficient resources to fulfil its mandate. Staff retention and recruitment are challenging, partly due to low remuneration. According to the authorities, new inspectors receive training on risks of THB for the purpose of labour exploitation. The checklist for labour inspectors³³ developed under the EU-funded FLOW project (2018-2020) continues to be used.³⁴ Some 10 000 labour inspections are carried out annually. In cases involving possible labour exploitation, the Inspectorate co-operates with the State Police, the SBG and NGOs. While the State Labour Inspectorate's mandate is separate from immigration control, close co-operation with the SBG takes place when inspections involve foreign nationals, including joint planning, site visits and analysis. During the reporting period, 501 joint inspections of workplaces employing foreign workers were conducted (32 in 2021; 119 in 2022; 129 in 2023; and 121 in 2024). In addition, it is possible to submit a confidential complaint and report a suspicious case on the website of the Labour Inspectorate.³⁵

52. The State Employment Agency (SEA) inspects recruitment agencies. It conducted 312 inspections between January 2019 and December 2024, and revoked 51 agencies' licences in 2022, 83 in 2023, 52 in 2024, and 8 in 2025, mainly due to tax debts. According to paragraphs 31.4 and 31.5 of Cabinet Regulation No. 458 "Procedures for the Licensing and Supervision of Merchants – Providers of Work Placement Services", the SEA may request explanations from recruitment agencies following complaints about possible regulatory violations and may notify the relevant authorities if unlicensed job placement services are reported. In 2023, the SEA received three complaints, and four in 2024, none of which concerned labour exploitation.

53. A migrant worker may change employers without restriction, provided the new employer issues an official invitation. If the change takes place within the validity of the residence permit, no new permit is required. However, if the permit has expired, a new one must be arranged through the new employer with the involvement of the Office of Citizenship and Migration Affairs. In 2024, there were 531 cases of workers changing employers.

54. Trade unions in Latvia have not been actively engaged in combating THB for the purpose of labour exploitation and do not have contacts with foreign workers who are not unionised.

³² For instance, Latvian embassies in the Netherlands, Belgium, Norway, Poland and Germany assist Latvian nationals (often recruited through intermediaries) by phone, email, or in person.

³³ <https://respect.international/uncovering-labour-trafficking-investigation-tool-for-law-enforcement-and-checklist-for-labour-inspectors/>

³⁴ See GRETA's third evaluation report on Latvia, paragraph 156.

³⁵ <https://www.vdi.gov.lv/en/form/zinot-par-neregistreto-nodarbina>

55. While welcoming the measures put in place in Latvia to protect migrant workers, GRETA notes that there are a number of remaining gaps related to the capacity and resources of the State Labour Inspectorate. 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 considers that the Latvian authorities should take further steps to prevent THB of migrant workers, in particular by:

- ensuring that sufficient staff, resources and training are made available to the State Labour Inspectorate to enable it to contribute to the prevention and detection of THB for labour exploitation;
- developing co-operation with trade unions in the prevention of THB for the purpose of labour exploitation.

iv. Asylum seekers, refugees and irregular migrants

56. In accordance with Section 1, paragraph 10, of the Asylum Law, an asylum seeker who is a victim of THB is considered to have special procedural or reception needs. According to the Asylum Law, the State Border Guard (SBG) and the Office of Citizenship and Migration Affairs (OCMA) shall inform asylum seekers in a timely manner and in a language they understand of the asylum procedure. Adopted on 31 May 2022, new Internal Regulations No. 23.1-8.2/12 on the "Procedure in the Field of Asylum to be Carried Out within the Competence of the State Border Guard" were issued, including specific actions that should be taken during the asylum procedure when there is a suspicion that an asylum seeker may be a victim of THB. If such indicators are identified, the SBG official must inform the presumed victims and obtain their consent to be provided with initial assistance and support. The person concerned is asked to sign a "certificate on the transfer of information to the State Police", which is available in 21 languages.³⁶ According to the authorities, if the person agrees to co-operate, the SBG promptly informs the State Police. The latter, in turn, informs social service providers and decides whether to initiate criminal proceedings. If the person declines, the SBG provides the presumed victim with information on the two NGOs who provide services to victims of THB. While this procedure is mandatory in asylum cases, the SBG indicated that it also applies if presumed victims of THB are identified among irregular migrants.

57. The asylum affairs division of the OCMA conducts asylum interviews and takes decisions on the applications submitted. According to the OCMA, during the asylum procedure, its staff assess vulnerabilities and special needs based on the asylum seeker's behaviour, statements, available documentation, and assessments by medical personnel. OCMA staff inform presumed victims of THB how to contact the NGOs providing assistance to victims of THB and the possibility to be granted a recovery and reflection period and may receive assistance from social workers as well as medical and psychological support, if required. However, GRETA was informed by several interlocutors that, in practice, the staff of the OCMA lack the capacity to perform such assessments and that they are not always carried out. In their comments on the draft GRETA report, the authorities noted that the OCMA applies the European Union Agency for Asylum (EUAA) practical tools when carrying out vulnerability assessments. The EUAA tools, and in particular the IPSN tool,³⁷ provide indicators of special needs which supports the identification of different categories of vulnerable persons, including victims of human trafficking.

58. There are two asylum reception centres in Latvia, under the responsibility of the OCMA: one in Mucenieki (Ropaži Municipality), which was established in 1998, and the other one in Liepna (Aluksne district, near the border with Russia), which opened in August 2023. The centre in Liepna has a total capacity of 252 and the one in Mucenieki, a capacity of 450. Each centre has 24/7 security and video

³⁶ English, Arabic, Bengali, Dari, Farsi, French, Georgian, Hindi, Russian, Kurdish, Sorani, Nepali, Panjabu (India), Panjabu (Pakistan), Pashto, Spanish, Tamil, Tigrinya, Urdu, German and Vietnamese.

³⁷ [IPSN tool](#) | [EUAA tool](#)

surveillance.³⁸ Both centres may also temporarily accommodate Ukrainians transiting through Latvia to other EU countries. Staff speak English and Russian, and if needed, online translation tools or interpreters are used. The OCMA provides asylum seekers with accommodation, a daily allowance of EUR 3 per person, as well as food packages and hygiene products under a long-term project funded by the Asylum, Migration and Integration Fund. Due to the high number of asylum seekers arriving at the Latvian-Belarusian border, the Ministry of the Interior requested support from the European Union Agency for Asylum (EUAA) to provide interpretation services during the asylum procedure. Interpreters were deployed at the Mucenieki asylum reception centre to assist with interviews, communicate decisions, and facilitate daily interaction with staff.

59. Presumed victims of trafficking identified during the asylum procedure are accommodated in a separate building of the Mucenieki asylum reception centre ("Bundulīši") which also houses families, unaccompanied children and other vulnerable asylum seekers, including persons with disabilities. It has three fully furnished apartments per floor. The ground floor is equipped for people with physical disabilities and problems of mobility. At the time of GRETA's visit, two possible victims of THB were accommodated there. Specialised assistance and support for THB victims are provided only after official identification.

60. In both centres asylum seekers are encouraged to take part in activities and local cultural events. In the Mucenieki asylum reception centre, integration activities are held two to three times per week by the NGO Shelter "Safe House", which organises language courses, vocational training seminars, and lectures on health, employment and financial management. The NGO also provides childcare for participants with children attending these sessions. Based on a memorandum of understanding concluded with the State Border Guard, the NGO "I Want to Help Refugees" regularly visits the Mucenieki immigration detention centre to organise leisure activities.

61. According to staff of the Ombudsman's Office, no trafficking-related risks were identified during visits to the Liepna and Mucenieki asylum reception centres in the past two years. According to Cabinet Regulation No. 489 of 26 July 2016 on "Internal Rules of Procedure of the Accommodation Centre for Asylum Seekers", persons and organisations involved in providing social support and assistance to asylum seekers residing in asylum centres have the right to visit them but must inform the centre prior to arrival. Staff indicated that the centres were visited by the Latvian Centre for Human rights, Shelter "Safe House", Centre MARTA, "I Want to Help Refugees", Caritas Latvia, UNHCR and IOM.

62. During the visit, the GRETA delegation observed that information on the asylum procedure is available at both asylum reception centres, including leaflets in seven languages. A website with further information can be accessed via a QR code. In addition, leaflets and general information on THB are available in the most common languages spoken by those accommodated in the centres. Furthermore, a poster with information on the 116111 helpline and its email address is displayed, along with posters "Recognise the threats of human trafficking!" which provide information in English on where to seek help, examples of trafficking scenarios, and a link to the OCMA website for further information.

³⁸ The asylum reception centre in Mucenieki is open, but for security reasons it is closed from 11 p.m. to 7 a.m., with exceptions made for working asylum seekers.

63. In 2022-2024, a total of 2,971 persons applied for asylum in Latvia (546 in 2022, 1,624 in 2023, and 801 in 2024). Additionally, 68 asylum applications were submitted at the border crossing points with Belarus (15 in 2022, 9 in 2023, and 44 in 2024). The main countries of origin of the asylum seekers were Tajikistan, Afghanistan and India. In 2024, there were 20 asylum applications submitted by unaccompanied or separated children, including 10 children from Somalia and 5 from Afghanistan. During the same period, 765 individuals were permitted entry on humanitarian grounds and allowed to apply for international protection. Of these, 217 were admitted in 2022, 428 in 2023, and 26 in 2024. According to the authorities, no individuals were granted refugee status or subsidiary protection exclusively on the grounds of being victims of THB.

64. Throughout the summer and autumn of 2021, tens of thousands of migrants, mainly from Iraq and Syria, but also from African and Asian countries, were lured into Belarus with false promises of easily crossing into the EU. Many of them remained stuck for prolonged periods of time on or near the borders with Poland, Lithuania and Latvia, without being able to claim asylum and have an assessment of their vulnerabilities. In August 2021, a reinforced regime with restrictive measures was introduced at the Latvian-Belarusian border. Since the introduction of these measures, the authorities have reported over 39,000 instances of non-admission³⁹ (4,045 in 2021, 5,286 in 2022, 13,863 in 2023, 5,388 in 2024 and 10,417 in 2025). According to NGOs and international organisations, pushbacks of migrants over the border with Belarus took place without assessing the risks individuals might face in Belarus, including human trafficking.

65. In a letter sent in August 2021 to Parliament and the Cabinet of Ministers, the Ombudsman stressed that, despite the emergency situation declared by the Cabinet of Ministers on 10 August 2021 at the Latvian-Belarusian border, the state must continue to uphold human rights and its international obligations.⁴⁰ The Ombudsman expressed concern over the order's provision to refuse asylum applications, warning that this may deprive individuals of a real and effective opportunity to seek protection. Emphasising the prohibition of collective expulsions and the principle of *non-refoulement*, the Ombudsman called for the use of force only as a last resort and urged that each case, especially those involving vulnerable persons, be assessed individually to ensure access to asylum remains available.

66. GRETA refers to the European Court of Human Rights judgment in the case of *H.M.M. and Others v. Latvia*, which involves 26 Iraqi nationals who alleged that they were subjected to repeated "pushbacks" at the Latvian-Belarusian border without access to asylum procedures, resulting in violations of their rights under Articles 2, 3, 5, and 13 of the European Convention on Human Rights and Article 4 of Protocol No. 4.⁴¹ Although some were eventually allowed into Latvia, they were detained and later deported to Iraq. In his third-party intervention to the Court in this case, the Council of Europe Commissioner for Human Rights criticised the use of emergency legislation that effectively denied asylum seekers access to asylum procedures, leading to widespread summary returns. He underscored that such returns occurred without individual assessments, violating the principle of *non-refoulement*.⁴² The case was referred to the Grand Chamber and remains pending, with a final judgment yet to be delivered, following a public hearing held on 12 February 2025.

67. On 19 July 2022, officials of the Ombudsman's Office visited the border inspection posts of Terehov and Grebneva to see how the influx of arrivals was dealt with in practice. They highlighted the particular vulnerability of people fleeing the war and suggested ways to make information on available assistance more accessible. On 19 September 2023, the SBG and UNHCR Latvia signed an agreement enabling UNHCR to carry out regular visits to border areas.⁴³ Border areas in Latvia are not accessible to NGOs.

³⁹ Instances of non-admission do not necessarily correspond to the number of individuals affected, as the same person may have been subject to repeated pushbacks and thus recorded multiple times.

⁴⁰ <https://www.tiesibsargs.lv/en/news/regarding-emergency-situation-on-the-border-of-latvia-and-belarus/>

⁴¹ [https://hudoc.echr.coe.int/app/conversion/pdf/?library=ECHR&id=003-8156289-](https://hudoc.echr.coe.int/app/conversion/pdf/?library=ECHR&id=003-8156289-11432664&filename=Grand%20Chamber%20hearing%20in%20the%20case%20H.M.M.%20and%20Others%20v.%20Latvia.pdf)

[11432664&filename=Grand%20Chamber%20hearing%20in%20the%20case%20H.M.M.%20and%20Others%20v.%20Latvia.p](https://hudoc.echr.coe.int/app/conversion/pdf/?library=ECHR&id=003-8156289-11432664&filename=Grand%20Chamber%20hearing%20in%20the%20case%20H.M.M.%20and%20Others%20v.%20Latvia.pdf)

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⁴² Available at: <https://rm.coe.int/third-party-intervention-hmm-and-others-v-latvia-by-michael-o-flaherty/1680b20cef>

⁴³ <https://www.rs.gov.lv/lv/jaunums/valsts-robezsardze-un-unhcr-vienojas-par-regularam-noverosanas-vizitem>

68. Following the full-scale invasion of Ukraine by Russia on 24 February 2022, Latvia adopted the Law on Assistance to Citizens of Ukraine, which grants temporary protection to Ukrainian refugees and access to rights and services (such as social assistance, healthcare, education, and employment) on an equal basis with Latvian citizens.⁴⁴ A Permanent Ukrainian Crisis Management Working Group was set up to deal with urgent issues, such as accommodation, people crossing the border from Russia, unaccompanied children and THB. Over 45 000 Ukrainians resided in Latvia in 2024 under temporary protection.

69. The authorities and NGOs have taken a number of steps to prevent THB of Ukrainian refugees. In March 2022, the Ministry of the Interior distributed materials on THB and available support services, and, in co-operation with UNHCR, produced printed materials and banners for use at border crossing points, support centres and accommodation facilities. The Ministry of the Interior, in collaboration with IOM, also disseminated anti-trafficking information via Telegram groups. In 2024, the OCMA launched an online campaign titled “Be aware of trafficking signs” targeting Ukrainians.⁴⁵ A free helpline (80700011) is available to provide social support and guidance to Ukrainians.

70. The Society Integration Foundation (SIF)⁴⁶ is a public institution tasked with promoting social cohesion, supporting civil society and facilitating the integration of vulnerable groups. Since 2023, its social workers and mentors have also supported asylum seekers, a role previously carried out by NGOs. Among its key activities is the operation of four “one-stop shops” across Latvia, providing services such as legal counselling, psychological support and language courses to third-country nationals and beneficiaries of international protection. The Foundation employs 17 staff in the four one-stop shops, which closely co-operate with the SBG, reception centres and detention facilities. Another activity of the SIF is supporting Ukrainians, including by providing them with Latvian language courses, cultural orientation and legal assistance, as part of an EU-funded project.⁴⁷ According to SIF staff, several suspected cases of THB have been detected, including a possible case of sexual exploitation involving a young Ukrainian woman, and a group of 10 presumed victims of labour exploitation from Tajikistan and Uzbekistan. Both cases were referred to the NGO Shelter “Safe House”.

71. In 2023, the National Anti-trafficking Co-ordinator delivered a lecture to “one-stop shop” staff on human trafficking for different forms of exploitation, key indicators for victim identification, and approaches to working with victims. In 2024, staff from the “one-stop shops” took part in EUAA online training on THB and reception of vulnerable persons, which included a module on identifying and supporting THB victims.

⁴⁴ Available at: <https://likumi.lv/ta/en/en/id/330546>

⁴⁵ As of 2024, all information campaigns targeting Ukrainians have been conducted in Ukrainian only, due to restrictions on the use of Russian in state-funded initiatives.

⁴⁶ More information about the Foundation is available at: <https://www.sif.gov.lv/en>

⁴⁷ The ESF+ project “Support for Social Workers and Social Mentors for Asylum Seekers and Recipients of International Protection” to further strengthen support mechanisms.

72. Section 18, paragraph 1, of the Law on Assistance to Citizens of Ukrainian provides for the appointment of temporary emergency guardians for Ukrainian children by the municipal Custody Court. From February 2022 to January 2025, 1 477 unaccompanied Ukrainian children (589 girls and 888 boys) were registered in Latvia, many of whom have since left the country. As of January 2025, 231 unaccompanied Ukrainian children (102 girls and 129 boys) remain in Latvia under temporary emergency guardianship. NGOs reported ongoing deficiencies in the support provided to all unaccompanied and separated children, including Ukrainian children, particularly concerning suitable accommodation, psychosocial assistance, and services. Staff from the Custody Court of Ropažu Municipality, which covers the Mucenieki asylum reception centre, reported two girls (one from Cameroon and the other from Ethiopia) accommodated at the Mucenieki asylum reception centre, who were identified as possible victims of trafficking for the purpose of sexual exploitation. In their comments on the draft GRETA report, the authorities indicated that the girls were almost 18 years old and were allowed to leave the premises without adult supervision in order to attend school and services on their own. Both girls were appointed legal guardians by the Ropažu Custody Court, which supported, in total, 17 unaccompanied children in 2022, 34 in 2023, and 30 by April 2024.

73. The Ministry of the Interior issued in 2023 the report "On the impact of measures to protect the rights and interests of unaccompanied minor asylum seekers on local government budgets", which stressed the need for additional funding for municipalities. According to NGOs and international organisations, there are deficiencies in providing assistance, including appropriate living conditions, psychosocial support, and guidance during asylum procedures. As noted by the Ombudsman, unaccompanied children receive insufficient care during the asylum process, being accommodated alongside adults and lacking tailored individual support.⁴⁸ The Ombudsman also underscored the heightened risks of THB faced by unaccompanied asylum-seeking children.

74. Opened in 2017, the Mucenieki immigration detention centre has a total capacity of 84 places (51 for men and 33 for women and families) across two separate buildings.⁴⁹ At the time of GRETA's visit, 21 persons were detained at the centre (20 men and one woman). The top nationalities include Afghanistan, Syria, Pakistan, India, Bangladesh, Cameroon, Iran, Russia and Tajikistan. Since 2021, no presumed victims of trafficking have been identified. The men's building includes a self-catering kitchen, dining area with meals delivered by an external company (three times daily for adults, four for children), a smoking room with a television, and isolation rooms for disciplinary and medical purposes. The women's building hosts families and includes a dining room, prayer room, gym, computer room, and kitchen. The first floor is adapted for persons with physical disabilities. Medical care is provided by an on-site doctor. An interpreter is present during interviews with detainees, including when informing them of their legal rights. A complaints' and applications' box is available, with information in six languages. Detainees can access legal aid via two official lawyer lists: one for self-funded legal services, and another for state-funded legal aid. Specialised NGOs, such as "I Want to Help Refugees", regularly access the centre.

75. According to Section 50.7 of the Immigration Law,⁵⁰ the Ombudsman monitors the removal process, including by visiting detainees subject to removal. During such visits, detainees have the opportunity to make complaints to representatives of the Ombudsman's Office, who assess whether the removal would be in breach of the principle of *non-refoulement*. The Ombudsman uses an assessment tool that includes indicators of possible trafficking.⁵¹

⁴⁸ Ombudsman of the Republic of Latvia, On Social Security for Asylum-seekers, 23 November 2023, Nr. 1-5/315, "Par nepilngadīgo patvēruma meklētāju bez pavadības tiesību un interešu aizsardzības pasākumu ietekmi uz pašvaldību budžetiem": <https://www.tiesibsargs.lv/wp-content/uploads/2023/11/par-patveruma-mekletaju-socialo-nodrosinajumu.pdf>

⁴⁹ See the report to the Latvian Government on the periodic visit to Latvia carried out by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (CPT): <https://rm.coe.int/1680abe944>

⁵⁰ <https://likumi.lv/ta/en/en/id/68522-immigration-law>

⁵¹ This assessment tool was fine-tuned within the framework of the project "Efficient Implementation of Observation and Removal Process (1st Stage)" (No. TSB/PMIF/2018/1).

76. While welcoming the implementation of the “one-stop shop” initiative and the steps taken to prevent vulnerabilities to THB among displaced persons from Ukraine, GRETA urges the Latvian authorities to take further measures to prevent asylum seekers and refugees from becoming victims of trafficking in human beings, in particular by:

- taking immediate and targeted action to remedy the deficiencies in the care and protection of unaccompanied and separated children by ensuring the allocation of adequate resources to municipalities to provide individualised support and child-friendly services, in full compliance with the best interests of the child (see also the recommendation in paragraph 123);
- sensitising professionals involved in the registration process of asylum seekers to the vulnerabilities that lead to THB;
- ensuring that an individual vulnerability assessment is systematically carried out in respect of all asylum seekers accommodated in reception centres by staff of the Office of Citizenship and Migration Affairs, as well as persons detected at the Latvian-Belarusian border by State Border Guard officials, with a view to identifying individual vulnerabilities and needs, and respecting the *non-refoulement* principle (see also the recommendation in paragraph 112).

77. Further, GRETA considers that the Latvian authorities should provide further training on human trafficking to staff of the State Border Guard, the State Police, the Office of Citizenship and Migration Affairs and any other relevant professionals involved in the asylum procedure.

v. Disadvantaged minorities

78. The Roma community of Latvia was recorded at 4 677 people in 2023, representing 0.25% of the country's total population.⁵² Roma associations consider that the actual number is higher.⁵³ The Roma community faces a number of obstacles in accessing education, housing and the labour market, which increases their vulnerability to exploitation.

79. During the reporting period, there have been two consecutive plans to promote the inclusion of Roma in education, employment, healthcare, housing and other aspects of life. The first, the 2021-2023 Implementation Plan for the Roma Strategic Framework, comprised targeted measures. The second, the 2024-2027 Plan for the Implementation of Measures of the Roma Strategic Framework, is co-ordinated by the Ministry of Culture, which is responsible for Roma issues at national level.

80. GRETA refers to the fourth opinion of the Advisory Committee on the Framework Convention for the Protection of National Minorities on Latvia, according to which there is a lack of determination on the side of the authorities to effectively improve the situation of Roma.⁵⁴ The measures for Roma inclusion are mostly funded by the EU and no targeted measures specifically addressing Roma are financed from the budgets of relevant ministries.

⁵² See Country report - Non-discrimination – Latvia – 2024: <https://www.migpolgroup.com/wp-content/uploads/2024/09/country-report-non-discrimination-DSBB24019ENN.pdf>, accessed on 14 May 2025.

⁵³ Latvijas Fakti Market and Social Research Centre (2015), *Romi Latvijā – Pētījuma ziņojums 2015 (Roma in Latvia)* https://www.km.gov.lv/sites/km/files/romi_latvija_petijums_lv1.pdf, accessed on 13 May 2025.

⁵⁴ Advisory Committee on the Framework Convention for the Protection of National Minorities (2023) Fourth Opinion on Latvia, adopted on 9 October 2023, paragraph 54, <https://rm.coe.int/4th-op-latvia-en/1680ae98f6> accessed on 10 May 2025.

81. The Latvian Roma Platform, which is primarily EU-funded, continues to promote co-operation among Roma communities, public institutions and social partners to enhance Roma integration. Since January 2024, the Anti-Discrimination Department has been established within the Ombudsman's Office. In 2022, the Ombudsman's Office published research on the situation of Roma⁵⁵ in seven municipalities,⁵⁶ conducted online discussions with Roma mediators on challenges facing the Roma community, produced Romani-language leaflets on how to file a complaint to the Ombudsman's Office, and launched an information campaign on Facebook titled "Ethnicity is an opportunity. Roma – one of us".

82. There is a high drop-out rate among Roma children due to their lack of Latvian language proficiency, as well as their difficult living conditions and the discrimination they often face in schools.⁵⁷ Research on the situation of Roma children, published in 2023, refers to negative attitudes from other students (47.7 %), early marriage (44 %) and encountering difficulties in studies (41.4 %) as reasons for lower school attendance among Roma children and for not completing primary education.⁵⁸ GRETA was informed that in 2021, the Government approved the Framework Document for Education Development 2021-2027, which includes a number of measures aimed at facilitating school attendance among Roma (for example, providing Roma mediators and Roma teacher assistant networks in schools with a higher number of Roma children).

83. The rate of Roma children attending special schools has continued to be disproportionately higher than the national average.⁵⁹ According to research by the Ombudsman's Office published in 2022, 65% of Roma students enrolled in basic education in Jurmala were attending a special school and 73% of those in Tukums county.

84. According to NGOs met by GRETA during the visit, there are risks of trafficking for the purpose of labour exploitation among Roma seasonal workers recruited in the agricultural sector in Germany and the Netherlands. They signed contracts they did not understand and were made to work up to 14 hours a day in exploitative conditions. In addition, there are concerns about the irregular status of Roma refugees from Ukraine who often lack legal status or documentation and move between Latvian municipalities seeking social benefits and housing.

85. According to the Latvian authorities, one case involving four Roma children from the same family who were forced to beg abroad by their relatives is currently under investigation (see paragraph 145).

86. While welcoming the plans to promote the inclusion of Roma, GRETA considers that the Latvian authorities should continue strengthening the prevention of THB among the Roma community, in particular by:

- taking sustained social, economic and other measures for the Roma community, including by promoting their access to education and the labour market;
- conducting targeted awareness raising within the Roma community concerning the risks of THB and by providing accessible information on safe migration, workers' rights and available support services, in co-operation with Roma mediators, civil society and community-based organisations.

⁵⁵ Ombudsman (2022), The situation of Roma in Latvia (*Romu situācija Latvijā*).

⁵⁶ Daugavpils, Jūrmala, Jelgava, Ventspils and Riga cities, and Tukums and Talsi counties.

⁵⁷ https://migrant-integration.ec.europa.eu/library-document/cypriot-roma-and-failure-education-anti-discrimination-and-multiculturalism-post_en, accessed on 3 May 2025.

⁵⁸ CIVVITA (2023) Research on the situation of Roma in Latvia 2023 (*Pētījums par romu situāciju Latvijā 2023*), <https://www.km.gov.lv/lv/media/35865/download?attachment>, accessed 10 May 2025.

⁵⁹ See Country report - Non-discrimination – Latvia – 2024: <https://www.migpolgroup.com/wp-content/uploads/2024/09/country-report-non-discrimination-DSBB24019ENN.pdf>, accessed on 14 May 2025.

vi. Persons with disabilities

87. Persons with disabilities⁶⁰ 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.⁶¹ 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.⁶²

88. Latvia ratified the UN Convention on the Rights of Persons with Disabilities in 2010. The Ministry of Welfare was designated as the focal point for its implementation, while the Ombudsman was assigned responsibility for monitoring its implementation. A Plan for Promoting Equal Opportunities for Persons with Disabilities⁶³ was implemented in 2021-2023, aiming at enhancing the inclusion of persons with disabilities in employment, education and social services. A new Plan for the Development of Equal Opportunities for Persons with Disabilities for the period 2024-2027 was adopted in 2023.

89. GRETA was informed that persons with disabilities have access to home care and rehabilitation services through the general health care system. Municipalities are responsible for assessing individual needs and providing tailored social services. According to the Latvian authorities, there are new social services available for persons with disabilities and mental disorders, which include support services for individual decision-making provided by specially trained support persons. The Ombudsman has received complaints related to the rights of persons with disabilities (32 in 2020, 37 in 2021 and 47 in 2022). Most of them related to problems with inclusive education, inaccessible environment, insufficient income to cover basic needs or lack of initiatives of local governments to develop community-based services suitable for people with mental disabilities.

90. The Custody Court is responsible for providing assistance to legally incapacitated persons who have approached the Orphans' Court for help and to represent them in criminal proceedings. The Ministry of Welfare controls the performance of social service providers, including long-term social care and social rehabilitation institutions accommodating persons with disabilities. The Ombudsman's Office inspects these institutions and provides recommendations. In 2022, as a result of visits to seven institutions, the Ombudsman's Office found that community-based services available in municipalities were very limited and institutional care for persons with severe disabilities was the only service offered by the state. During the visits, several challenges were noted, including inadequate staffing levels and an unclear division of responsibilities.

91. Section 26.1 of the Law on the Protection of the Rights of the Child provides that the State and local governments shall support families, in particular those caring for a child with a disability, and ensure the provision of appropriate assistance. However, NGOs and staff of the Ombudsman's Office indicated that state support for families with children with disabilities is insufficient. According to NGOs, children with disabilities are particularly vulnerable to trafficking, especially for the purpose of sexual exploitation. The Latvian authorities stated that any identified child victims of THB with disabilities would be

⁶⁰ 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.

⁶¹ See OSCE, *Invisible Victims: The Nexus between Disabilities and Trafficking in Human Beings*, March 2022, page 16.

⁶² CEDAW, General recommendation No. 38 (2020) on trafficking in women and girls in the context of global migration, paras. 40 and 55.

⁶³ <https://likumi.lv/ta/id/325492-par-planu-personu-ar-invaliditati-vienlidzigu-iespeju-veicinasanai-20212023-gadam>, accessed on 14 May 2025.

accommodated in a specialised category of foster family where the caregivers receive specific training to provide tailored support to children with disabilities or severe functional impairments.⁶⁴ At the time of the evaluation visit, 52 children were accommodated in this type of foster care but none of them was a victim of THB.

92. GRETA was not provided with the number of persons with disabilities who have been identified as victims of trafficking during the reporting period. However, GRETA was informed of the case of an Indian man with a mental disability who was exploited in a shop owned by Indian nationals, identified as a victim of THB and provided with assistance by an NGO. The NGOs providing assistance to victims of THB noted that when they lacked expertise to support victims with disabilities, they would contact a specialised NGO, the Resource Centre for People with Mental Disability "ZELDA". During the reporting period, ZELDA was contacted in one case involving a victim with a mental disorder where highly specialised technical support was required.

93. GRETA considers that the Latvian authorities should:

- provide training on trafficking in human beings to all staff interacting with persons with disabilities, including children, which emphasises the identification of risk factors and early detection of trafficking indicators;
- enhance access to inclusive, community-based services adapted to the needs of persons with disabilities to mitigate their exposure to risks of trafficking;
- guarantee adequate state-funded support for families with children with disabilities and ensure that facilities and institutions accommodating persons with disabilities are sufficiently resourced and staffed to meet the needs of the beneficiaries as a preventive measure to mitigate their exposure to risks of trafficking.

vii. Homeless people

94. Homeless people in Latvia, most of whom are men with severe substance use disorders or alcohol addiction, are frequently targeted for exploitation, including being trafficked for the purpose of forced begging in other EU countries (especially in Poland), exploited in financial fraud schemes through the misuse of their personal documents, or coerced into committing criminal offences.

95. According to the Latvian authorities, implementing preventive measures for this vulnerable group is a significant challenge. Local governments bear responsibility for ensuring the provision of basic services to homeless people, such as access to shelters and social assistance. According to the Welfare Department of Riga City Council, approximately 4 000 persons benefit annually from municipal shelter services in the capital. The department operates a day centre, two mobile outreach teams, several night shelters and five social rehabilitation centres. It allocates an annual budget of EUR 7 million for services targeting homeless people. Furthermore, the city of Riga is piloting the "Housing First" initiative, which offers housing to homeless individuals without imposing preconditions for access.

⁶⁴ Cabinet Regulation No. 354 "Regulations for Foster Families" indicates that a foster family for a child with a disability for whom an opinion regarding the necessity of special care due to severe functional disorders has been issued [...] is a foster family in which at least one of the spouses (persons) has at least 12 months long personal or professional experience in work with children with severe functional disorders.

96. Latvia does not have a national strategy on homelessness, nor is there a legal obligation to systematically collect data on homelessness at the national level. However, municipalities are required to collect data in a database run by the Ministry of Welfare concerning the provision of social services, including data related to shelter services and the number of beneficiaries.⁶⁵

97. During the evaluation visit, GRETA visited the Salvation Army Day centre for homeless people, where beneficiaries are provided with meals and a place to stay during the day. The centre's staff also support homeless people in job-seeking efforts. However, they noted the considerable challenges involved in reintegrating homeless people into society. The head of the day centre has received training on THB and maintains co-operation with the NGOs providing assistance to victims of THB. No presumed victims of trafficking among homeless people were detected during the reporting period.

98. Staff of the Consular Department of the Ministry of Foreign Affairs reported a case from 2023 involving a Latvian man who was recruited with the promise of employment abroad and trafficked to Denmark and Germany. He ended up living on the streets. Upon identification, the Latvian consular services in Denmark issued him with a return certificate to facilitate his travel back to Latvia, organised his travel and established contact with social service providers to ensure that appropriate assistance was provided upon his return.

99. Another case previously described in GRETA's third report on Latvia concerns Latvian citizens with alcohol or other addictions who were recruited from the streets and accommodated in three locations under the false pretext of undergoing "rehabilitation".⁶⁶ Instead, they were forced to work in agriculture, forestry and/or wood processing (see also paragraph 144).

100. GRETA invites the Latvian authorities to:

- ensure that homeless people are provided with accommodation and access to essential services, in a manner that prevents them from becoming victims of THB and exploitation;
- continue their efforts towards the prevention of trafficking in human beings among homeless people, including by collecting national data about it.

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

101. 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".

⁶⁵ It should be noted that the data collected pertain to individuals who have accessed shelter services, which does not necessarily equate to a formal identification of homelessness.

⁶⁶ For further information, see paragraph 84 of GRETA's third report on Latvia.

a. Identification of victims of THB

102. As noted in GRETA's third evaluation report,⁶⁷ a National Referral Mechanism (NRM) is still not formalised in Latvia. The identification of victims of THB in Latvia is carried out in accordance with Cabinet Regulation No. 344 "Regarding the Procedures by which Victims of Trafficking in Human Beings Receive Social Rehabilitation Services, and the Criteria for the Recognition of a Person as a Victim of Trafficking in Human Beings". Detection of possible victims of THB is carried out by police officers, border guards, consular officials, social service providers, labour inspectors, hotline operators, Latvian or foreign NGOs. Formal identification as a victim of THB takes place either by decision of an investigator or a prosecutor as part of criminal proceedings, or by an assessment report of the multi-disciplinary commission (comprising a social worker, a psychologist, a lawyer, and if necessary, other specialists, including representatives of the two specialised NGOs providing services to victims of trafficking) if there is no criminal investigation or the victim does not wish to participate in criminal proceedings.

103. During the reporting period, more victims of THB were identified by the multi-disciplinary commission (114 in total: 44 in 2021, 16 in 2022, 21 in 2023 and 33 in 2024) than by the police (35 in total: 17 in 2021, 10 in 2022, three in 2023 and five in 2024).

104. As evidenced by the statistics in paragraph 11, labour exploitation remains the main form of exploitation of identified victims of THB in Latvia. The State Labour Inspectorate does not collect data on the number of possible victims detected by its inspectors during workplace inspections. Presumed THB cases are referred to the State Police and the two NGOs providing assistance to victims of THB. The Labour Inspectorate indicated that it had reported to the State Police presumed victims of labour exploitation, including three Latvian nationals (two men and one woman) exploited in a canning factory in 2022, and two Indian men exploited in a café in 2023.

105. Challenges persist in ensuring that front-line professionals, including police officers, social workers and health-care staff, are adequately trained and sufficiently involved in identification efforts of victims of THB for the purpose of sexual exploitation. In particular, there is need for enhanced outreach work, proactive victim identification and the recognition of indicators of sexual exploitation (such as signs of coercion, control by others, restriction of movement, withholding of identity documents, excessive dependency on exploiters or abuse of a position of vulnerability). In their comments on the draft report, the authorities stated that, between 2021 and 2024, out of 18 identified victims of sexual exploitation, 11 victims were initially detected by the State Police, municipalities or the Asylum Centre. This demonstrates that in more than half of the cases, the primary source of identification and referral was front-line professionals.

106. As already mentioned in paragraph 57, the staff of the Office of Citizenship and Migration Affairs (OCMA) often lack the necessary capacity to conduct vulnerability assessments. To increase the possibility of identifying victims of human trafficking, the OCMA is organising consultation days where asylum seekers can meet the NGO Shelter "Safe House". In their comments on the draft GRETA report, the authorities indicated that two asylum seekers were identified as victims of THB in 2023 and two in 2024.

107. GRETA was informed that the SBG did not track cases of possible THB victims referred to NGOs or the Police. SBG officers met during the visit to the Mucenieki immigration detention centre indicated that they had not received training on THB during the reporting period. GRETA noted that they had very limited knowledge of THB and how to detect trafficking indicators as well as no standard procedure for identification of possible victims of THB. In 2024, as part of efforts to combat irregular migration and employment, the Latvian authorities detained 113 individuals for irregular border crossing at the Latvia-Belarus border (93 adults and 20 children). The main countries of origin were India, Bangladesh and Syria. Given the lack of adequate training and knowledge on how to detect THB, there is a risk that possible victims, including children, are not detected among those apprehended, leaving them without

⁶⁷ GRETA's third evaluation report on Latvia, paragraph 158.

access to protection and assistance measures. In their comments on the draft GRETA report, the authorities indicated that the qualification enhancement programmes of the State Border Guard College in the field of combating human trafficking are developed in accordance with the requirements set by the European Union regulatory framework. The training content takes into account the Common Core Curriculum developed by Frontex, which places particular emphasis on the ability to identify victims of human trafficking, to carry out appropriate initial actions, and to address the risks and challenges related to such situations. As a result, the authorities stated that officials of the Mucenieki immigration detention centre have acquired the necessary knowledge to identify victims of human trafficking. The authorities also stated that State Border Guard officials apply the indicators included in the Frontex Handbook on Anti-Trafficking Training for Trainers, as well as the criteria established in the Law on the Residence of a Victim of Human Trafficking and Cabinet Regulation No. 344 of 16 July 2019. As for personal interviews carried out by the OCMA, established protocols are reportedly in place, based on the EUAA forms.

108. As indicated in paragraph 68, in 2024 over 45,000 Ukrainians resided in Latvia under temporary protection. According to the authorities, there have been no potential or formally identified victims of THB among Ukrainians fleeing the war.

109. The 2022 annual report of the Ombudsman indicated that in 2022, 60 forced return decisions were adopted, and 28 forced return operations were carried out returning 54 persons to their country of origin.⁶⁸ According to Section 50.7 of the Immigration Law, staff of the Ombudsman's Office are tasked to observe the return process. During the reporting period, they visited and interviewed 11 detained foreigners to be returned but did not participate in any return operations. No indicators of THB were detected.

110. The identification of child victims of THB remains limited (see paragraph 11), despite the presence of vulnerable groups, such as children transitioning out of institutional and foster care and children from socially disadvantaged backgrounds. The consistently low number of identified child victims suggests gaps in proactive identification efforts. GRETA draws attention to the need for a robust child protection system capable of recognising indicators of trafficking, particularly among children in vulnerable situations.

111. Although no children were held at the Mucenieki immigration detention centre at the time of the visit, GRETA notes with concern that the practice of detaining unaccompanied and separated children persists. While the legal framework allows for alternative measures, they are reportedly rarely applied (see paragraph 33). GRETA notes that the practice of placing irregular migrant children in detention exacerbates the difficulty of identification of victims of trafficking among them. The Latvian authorities have stressed that children under 14 are never placed in detention centres and that detention is used as a measure of last resort and for as short a period as possible when it is not possible to ensure the proper conduct of the asylum procedure by less restrictive means or to guarantee national security and public order and safety.

112. GRETA urges the Latvian authorities to take further steps to improve the identification of victims of trafficking for all forms of exploitation, including by:

- providing further training and guidance to law enforcement officials, social workers, health-care staff and other frontline professionals to ensure the timely identification of victims of trafficking and their referral to support services, regardless of whether criminal proceedings are initiated;
- ensuring that law enforcement officials and social workers adopt a more proactive approach and increase their outreach work to identify victims of human trafficking for the purpose of sexual exploitation;

⁶⁸ See page 81 of the 2022 annual report.

- ensuring that a proper vulnerability assessment is systematically carried out in respect of all asylum seekers by staff of the Office of Citizenship and Migration Affairs, and that it includes the detection of possible indicators of trafficking in human beings (see also the recommendation in paragraph 76);
- adopting binding protocols for the identification of trafficking victims amongst unaccompanied and separated children;
- putting an end to the detention for immigration purposes of unaccompanied and separated children older than 14 and seeking alternatives to detention, in line with the best interests of the child.

113. Further, GRETA considers that the Latvian authorities should:

- formalise without further delay a National Referral Mechanism which defines the procedures, roles and responsibilities of all frontline actors who may come into contact with victims of trafficking;
- put in place a procedure for the identification of victims of trafficking among irregular migrants, fully assessing the risks of trafficking or re-trafficking on return. In this context, full consideration should be given to the UNHCR's Guidelines on the application of the Refugees Convention to trafficked persons and GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection;
- provide training on the identification of victims of trafficking amongst asylum seekers and detained migrants to staff of the State Border Guards, the State Police, the Office of Citizenship and Migration Affairs and other relevant professionals involved in the identification of victims of trafficking in human beings;
- strengthen the identification of child victims of THB by ensuring the effective use of specific indicators, enhancing the training of professionals likely to come into contact with child victims, and reinforcing the child protection system's capacity to detect trafficking among children in vulnerable situations, such as those transitioning out of institutional or foster care.

b. Assistance to victims

114. Social rehabilitation services for victims of THB are provided according to Cabinet Regulation No. 344.⁶⁹ As noted in GRETA's third report,⁷⁰ only officially identified victims of trafficking can receive state-funded assistance on the basis of a certificate confirming the identification by the police or prosecutor (if the victim participates in criminal proceedings) or by the multi-disciplinary commission. The authorities indicated that this approach allows victims to receive support regardless of whether they have been recognised as a victim in criminal proceedings⁷¹ or his/her willingness to co-operate in the investigation.

⁶⁹ Cabinet Regulation No. 344 "Regarding the Procedures by which Victims of Trafficking in Human Beings Receive Social Rehabilitation Services, and the Criteria for the Recognition of a Person as a Victim of Trafficking in Human Beings".

⁷⁰ GRETA's third evaluation report on Latvia, paragraph 191.

⁷¹ According to the authorities, in this case, the person may be granted witness status through a certificate issued by a law enforcement authority.

115. Two NGOs - Shelter "Safe House" and the Centre MARTA - continue to provide the social rehabilitation programme for victims of THB,⁷² as described in the previous GRETA report.⁷³ Although there is no formal division of the assistance provided by them, in practice, the Shelter "Safe House" primarily supports victims of labour exploitation, while Centre MARTA focuses on assisting victims of sexual exploitation.

116. GRETA was informed by NGOs that the duration of the THB rehabilitation programme, which remains limited to 180 days, is insufficient, and there is a lack of long-term state-funded support, particularly concerning long-term housing support and assistance with daily expenses. This duration is considered inadequate for the comprehensive rehabilitation of severely traumatised victims, who often require extended support to address the complex physical, psychological, and social consequences of trafficking. Any support provided beyond 180 days is financed through donations. Moreover, NGOs indicated that the delivery of the rehabilitation programme is hindered by limited financial resources. Many victims lack support networks and therefore require intensive and sustained assistance.

117. Further, according to the research included in the report published by Centre MARTA in March 2022 (see paragraph 21), the current social rehabilitation programme for victims of THB is based on the needs of adult victims and is not effective for children. There is a lack of a child-centred approach and limited financial resources. As already noted in paragraph 73, shortcomings persist in the provision of support, adequate living conditions, psychosocial care, and guidance to unaccompanied and separated children.

118. The Ministry of Welfare indicated that in 2021-2022, the social rehabilitation programme was planned to be allocated an annual budget of EUR 135 110, which was increased to EUR 192 311 in 2023 following the conclusion of a new contract with the two NGOs. However, the actual expenditure varied, with EUR 224 560 in 2021, EUR 106 322 in 2022, and EUR 153 924 in 2023, depending on the number of victims assisted.

119. The Centre MARTA receives monthly funding based on reports on the number of victims enrolled in the rehabilitation programme, with a current rate of EUR 37.86 per person and per day. Additional costs include individual consultations (EUR 46.20 per session), pre-recognition consultations prior to the victim's formal identification in criminal proceedings (EUR 14.65 per hour), commission fees, and post-rehabilitation support. In 2024, when assistance had to be provided to 10 Tajik nationals, the three-month support costs ranged from EUR 13 000 to EUR 19 000. According to the Ministry of Welfare, it is possible to request and receive additional funding from the Ministry's social services budget.

120. The Centre MARTA currently operates three apartments which can accommodate victims of THB in Riga, with a fourth one expected by the end of 2025, as well as five apartments in Rēzekne and two in Liepāja. In addition, the Centre MARTA can cover the cost of alternative accommodation (such as hotels, municipal housing or rented apartments) through government funding. The shelter "Safe House" rented a flat to accommodate victims, which accommodated 22 victims of THB in 2021, five in 2022, seven in 2023, and five in 2024. However, due to insufficient financial resources, it was ultimately forced to relinquish the flat in 2025. There are no specific shelters for male victims of THB. Notably, Latvia does not currently provide shelter facilities exclusively dedicated to victims of THB. In their comments on the

⁷² Information about the rehabilitation programme can be found at: <https://www.siva.gov.lv/lv/pakalpojumi/socialas-rehabilitacijas-pakalpojumi-cilveku-tirdzniecibas-upuriem>, accessed on 6 May 2025.

⁷³ The programme includes psychosocial support, including individual counselling sessions according to the client's needs; accommodation; involvement in training and education programmes to facilitate customer reintegration into society and/or labour market; psychosocial support (individual counselling by a lawyer, social worker and psychologist), interpreter services, and legal assistance. In case the victim has a child, the service provided will arrange, if necessary, for the person and the child (if they are with the person) to travel from the foreign country to the place where the services are provided and accompanying the person if they are unable to travel independently.

draft GRETA report, the authorities argued that providing separate accommodation entails fewer risks and represents a more effective response than placing all victims together in a single facility.

121. The helplines operated by the shelter "Safe House" (28612120) and Centre MARTA (67378539) continue to function as described in GRETA's third evaluation report.⁷⁴ The first one received a total of 248 calls from 2021 until 31 March 2025. In addition, both NGOs provide counselling services in person and via e-mail. According to social service providers, two criminal proceedings were initiated in 2021 and one in 2023 following contacts made through these helplines.

122. The Shelter "Safe House" has continued to implement the project "NET-WORKS" which aims at supporting the long-term integration of foreign victims of THB into the labour market. The project has produced information materials for professionals working with victims, including a report on support available in Latvia for victims of THB and a summary of good practices implemented in the field of support for victims of THB.⁷⁵

123. GRETA once again urges the Latvian authorities to:

- ensure that state funding for the social rehabilitation programme for victims of THB is sufficient to cover the needs of all victims, including their access to appropriate and safe accommodation, for the duration necessary to achieve their recovery, and regardless of the victim's willingness to co-operate in criminal proceedings;
- ensure the provision of adequate support and services tailored to the specific needs of child victims of trafficking, with particular attention to unaccompanied and separated children, especially in the context of asylum procedures. This includes the provision of suitable and child-friendly accommodation and access to specialised assistance and psychosocial support in line with the best interests of the child (see also the recommendation in paragraph 76).

124. Further, GRETA considers that the Latvian authorities should provide safe and suitable accommodation for male victims of THB.

3. Substantive criminal law and procedural law

125. 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.

⁷⁴ GRETA's third evaluation report on Latvia, paragraph 37.

⁷⁵ The materials are available on this website: <https://patverums-dm.lv/lv/net-works>

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

126. 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.⁷⁶ 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.”⁷⁷

127. Section 154², paragraph 1, of the Latvian Criminal Law (CL) which criminalises trafficking in human beings, lists the “state of vulnerability or helplessness” of the victim as one of the means used in the commission of THB in the case of adult victims.⁷⁸ Section 154², paragraph 4, provides that “a position of vulnerability” occurs when a victim is in a situation in which there is no real or acceptable alternative but to undergo or succumb to exploitation. Proof of the use of means is not required when the victim is a child (Section 154², paragraph 2).

128. According to the Criminal Department of the Supreme Court, the investigation must prove that the defendant knew or should have known about the victim’s vulnerability and intentionally manipulated the victim for the exploitation. Prosecutors may, in order to prove that the accused was aware of the state of vulnerability of the victim, take a decision to ask for an expert examination, in accordance with Section 200 of the Criminal Procedure Law (CPL). Experts are reportedly often invited to appear in court to give evidence in order to help understand and prove the vulnerable position of a victim.

129. GRETA was informed that offenders in human trafficking cases often exploit multiple, overlapping forms of vulnerability, which may include the victim’s difficult economic situation, social isolation, marginalised or migrant background, poor health condition, low self-esteem, emotional distress or a history of violence. The Explanatory remarks to the CL note that individual vulnerability includes a dysfunctional family, physical or mental health problems, alcohol, drug or psychotropic substance dependence.⁷⁹ The Financial Intelligence Unit (FIU), in its 2022 strategic analysis report referred to in paragraph 148, underscored the centrality of vulnerability in trafficking cases and identified as vulnerability factors poor credit history, substance addictions, limited knowledge of the language, intellectual disabilities, being elderly or homeless.

130. According to the Prosecutor’s Office, there are significant challenges in identifying vulnerabilities in cases of human trafficking and persuading the courts that, even if an individual is an adult, he or she may still be vulnerable and qualify as a victim. According to the State Police, a shared and consistent understanding of vulnerability is yet to be established in practice.

131. The Latvian authorities referred to the judgment of the Vidzeme Regional Court of 9 March 2020 (No. 11815003517) which illustrates how the concept of “abuse of a position of vulnerability” is applied. While the court of first instance took into account the victims’ state of vulnerability, the Vidzeme Regional

⁷⁶ See UNODC Issue Paper *Abuse of a position of vulnerability and other “means” within the definition of trafficking in persons*, United Nations, April 2013, page 3.

⁷⁷ 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.

⁷⁸ Section 154², paragraph one (unofficial translation): (1) trafficking in human beings is the recruitment, transportation, transfer, concealment, accommodation or receipt of persons for the purpose of exploitation, [...] using the dependence of a person on the perpetrator or his or her state of vulnerability or helplessness [...].

⁷⁹ Criminal Law Commentaries, Second Edition (Chapters IX-XVII) U.Krastiņš, V.Liholaja – Riga: Tiesu namu aģentūra, 2016, page 394.

Court concluded that the age of the victims, their physical condition and economic need did not, in themselves, amount to a state of vulnerability. The court also found that factors such as the absence of a formal employment contract, lack of alternative job opportunities, and financial insecurity did not suffice to establish that the victims were dependent on the accused or that he/she had exploited their situation. Following the prosecutor's appeal, the Supreme Court, in its decision of 31 March 2021, overturned the Vidzeme Regional Court's judgment. It held that the latter court had failed to properly assess all the evidence, particularly regarding whether the victims were in a state of vulnerability.⁸⁰ The Supreme Court emphasised that vulnerability arises not only from the victims' personal characteristics but also from their social circumstances, living conditions, prior experiences, health and the conduct of others (particularly the accused's criminal actions).

132. Reference should also be made to the judgement of the Riga District Court of 7 September 2023 (No. 11815001121) in which a man, charged under Section 154¹ of the CL, exploited the vulnerability of five persons (which included lack of income, employment, stable housing, family support and education, as well as mental health issues) to recruit them for work on his properties, promising food, accommodation and wages which were never provided.⁸¹ The Riga District Court, endorsing the agreement between the prosecutor and the accused, imposed a sentence of four years and six months' imprisonment and a fine of EUR 12 400 (equal to 20 minimum monthly salaries), suspended for a 5-year probationary period.

133. A third illustrative case concerns the judgment of the Vidzeme Regional Court of 15 March 2023 (No. 11815000414), involving three women and one man charged under Section 154¹, paragraph 3 of the CL, with two of them (one woman and one man) also charged under Section 193(2) of the CL. Operating as an organised group, they recruited women with intellectual disabilities and forced them to marry Pakistani men in order to enable the latter to obtain residence in the European Union. The Court noted that the traffickers exploited multiple vulnerabilities of the victims, including mental and physical disabilities, economic hardship, having to take care of their young children, and social isolation. The victims were deprived of their identity documents and, once abroad, were subjected to emotional, physical and sexual abuse and held in captivity. The Court found that the accused had acted with direct intent against particularly vulnerable individuals, whose condition placed them in a heightened state of vulnerability and deemed the offences to be of the highest degree of harm.⁸²

134. During the reporting period, training activities were organised for judges, prosecutors and investigators to strengthen their capacity to deal with THB cases (see paragraph 150).

135. GRETA welcomes the application of the concept of abuse of a position of vulnerability in Latvian case-law and invites the Latvian authorities to continue providing investigators, prosecutors and judges with training and guidance on recognising the existence or emergence of a victim's position of vulnerability, as well as understanding how such vulnerability may be exploited in the context of THB.

b. Investigations, prosecutions and sanctions

136. The Anti-Trafficking Unit of the State Police investigates cases of THB and related offences. Its representatives indicated that a 2022 reform had assigned the Anti-Trafficking Unit the responsibility for investigating sex-related offences against children, without a corresponding increase in the number of investigators or available resources.

⁸⁰ See paragraph 6 of the Supreme Court's decision of 31 March 2021 in case No. SKK-51/2021, ECLI:LV:AT:2021:0331.11815003517.7.L.

⁸¹ Available: <https://manas.tiesas.lv/eTiesasMvc/nolemumi/pdf/514241.pdf>

⁸² <https://manas.tiesas.lv/eTiesasMvc/nolemumi/pdf/518949.pdf>

137. Several reorganisations of the Prosecutor's Office took place in 2022-2024, leading to the dismantling of the Specialised Prosecutor's Office on Organised Crime and the resulting lack of a central specialist team for THB cases. In 2023, by order of the Prosecutor General, two senior prosecutors with expertise on THB were appointed to provide guidance and expert support to first-instance prosecutors, as well as to oversee the handling of individual cases. As of 2025, their number was reduced, with only one prosecutor remaining available. Prosecutors interviewed during the visit noted that few THB cases reach the Prosecutor's Office and that insufficient evidence frequently hampers prosecution efforts.

138. The number of investigations into THB or related offences was as follows: in 2021, four under Section 154¹ of the CL (two related to sham marriages and two to labour exploitation) and two under Section 165¹ of the CL (transfer a person for the purpose of sexual exploitation); in 2022, eight under Section 154¹ (four related to sexual exploitation, one for labour exploitation, one for sham marriage and two for the purpose of forced criminality); in 2023, two under Section 154¹ (related to labour exploitation); and in 2024, three under Section 154¹ (two related to forced begging and one for labour exploitation). As regards the number of prosecutions, there were two in 2021 (one related to labour exploitation and the other to sham marriage), two in 2022 (both related to labour exploitation), two in 2023 (one related to sexual exploitation and the other to forced labour), and two in 2024 (both related to forced labour).

139. As a result of the joint inspections of workplaces employing foreign workers conducted by the Labour Inspectorate and the SBG, one criminal case related to THB was initiated in 2021, two in 2022, and one in 2023. The investigations in all these cases have been completed and submitted to the court of first instance.

140. According to NGOs met by GRETA, the State Police Anti-Trafficking Unit does not initiate investigations into the majority of cases referred to them by NGOs, often citing insufficient evidence as the reason for not initiating investigations.

141. The number of persons convicted under Section 154¹ of the CL was 1 in 2021, 8 in 2022, 5 in 2023 and one in 2024 (at first instance). The imprisonment sentences ranged from two to six years. Out of the 15 sentences, two were suspended. No legal entities were convicted of THB.

142. In 2023, the Division of Case Law of the Supreme Court of Latvia prepared a summary of case-law⁸³ from 2014 to 2023, focusing on Section 154¹ and 165¹ of the CL. It provides an analysis of court rulings, sentencing trends, and the interpretation of legal provisions, highlighting issues of consistent application of penalties and challenges in recognising the vulnerability of victims.

143. The authorities indicated that court proceedings in trafficking cases can last up to 10 years, typically five to seven. This extended duration is not specific to THB cases but reflects the general length of complex proceedings, which include trafficking cases.

144. GRETA received updated information on three cases which were ongoing at the time of the third evaluation.⁸⁴ In the first case, which concerned labour exploitation in the agricultural sector, the accused was acquitted by the Appeal Court. The second case, which concerned labour exploitation of Indian nationals in a cookie factory, is still being examined by a first instance court. The lack of a mutual legal assistance agreement with India reportedly makes it difficult to hear the witnesses who had left Latvia in the meantime. In the third case, which concerned Latvian citizens suffering from addictions who were forced to work in agriculture, forestry and/or wood processing, 160 victims had been identified in total, but only 14 agreed to be officially recognised in the proceedings.⁸⁵ In their comments on the draft report,

⁸³https://www.at.gov.lv/files/uploads/files/6_Judikatura/Tiesu_prakses_apkopojumi/2023/Apkopojums%20par%20cilveku%20tirdzniecibu.docx

⁸⁴ See GRETA's third evaluation report on Latvia, paragraphs 82-84.

⁸⁵ <https://www.prokuratūra.lv/lv/aktualitates/2024/aktualitates/tiesai-nodota-kriminallieta-desmit-personu-apsudziba-par-cilveku-tirdzniecibu-organizeta-grupa-un-noziedzigi-iegutu-lidzeklu-legalizesanu-3203>, accessed on 11 May 2025.

the Latvian authorities indicated that the second and third cases were still pending before the court of first instance.

145. GRETA was informed of another ongoing investigation into a case of THB involving four children who had been forced to beg and engage in theft (see also paragraph 85). In 2023, criminal proceedings were initiated against their mother and uncle. In 2024, the case was transferred to the Public Prosecutor's Office for indictment and is currently under their consideration. The children have been removed from the family by decision of the Custody Court and placed in foster care. In their comments on the draft report, the Latvian authorities indicated that the investigation by the State Police had been concluded. However, during the prosecution stage, both suspects disappeared, leading to the suspension of the criminal proceedings and the launch of an international search.

146. Another recent case concerns two Indian nationals recruited by an Indian citizen who promised them well-paid jobs as cooks, along with free accommodation. Upon arrival in Latvia, they were forced to work under abusive conditions, their identity documents were confiscated, and they were threatened with deportation if they complained to the police. The case was investigated by the Police and transferred to the Prosecutor's Office in May 2024. In their comments on the draft report, the Latvian authorities indicated that the case was before the court of first instance.

147. As outlined in paragraph 84, Roma seasonal workers recruited for agricultural work in Germany and the Netherlands face risks of trafficking for the purpose of labour exploitation. In their comments on the draft report, the authorities stated that they were not previously aware of such cases and noted that if a person goes abroad for work and is deceived there, the Latvian authorities learn about the situation only when information is provided by the respective country or by the individuals themselves. The authorities indicated that co-operation had been established with counterparts in the United Kingdom in investigating a case involving the recruitment of Roma persons for labour exploitation, in which the perpetrators were convicted in the UK.

148. According to information provided by the FIU, out of a total of 23,708 Suspicious Transaction Reports (STRs), 81 were related to THB (5 in 2021, 39 in 2022, 16 in 2023 and 21 in 2024). Most of the STRs were reported by payment institutions (e.g. MoneyGram and Western Union). In 2022-2024, the FIU communicated nine cases to the State Police based on suspicion of possible THB. In 2022, the FIU in co-operation with the Ministry of the Interior, the State Police and the Prosecutor's Office issued a strategic analysis report "Human trafficking and associated money laundering".⁸⁶ GRETA was informed that all FIU staff receive mandatory training on THB and financial investigations. According to information provided by the State Police, in 2021-2023, a total of EUR 809 903 was seized in cases under Section 154¹ of the CL.

149. During the reporting period, a range of training activities on THB were delivered. The State Police College, through its Training Centre for Investigators, provided annual training for investigators and analysts, covering relevant case-law and practical guidance on evidence collection. In total, 16 training sessions were held in 2022 (with 500 participants), 17 in 2023 (around 500 participants), and 17 in 2024 (over 400 participants), targeting members of the State Police, State Border Guard, judiciary, prosecution and the Financial Intelligence Unit (FIU). Specific training on THB for the judiciary was organised by the Latvian Judicial Training Centre in 2022 and 2023, including a workshop on relevant judgments of the European Court of Human Rights and a one-day session focused on THB for the purpose of labour exploitation, delivered in co-operation with the Ministry of the Interior. Furthermore, the newly established Academy of Justice, operating since January 2025, began offering interdisciplinary training for judges, prosecutors and judicial assistants. GRETA was informed that some training on investigating and prosecuting THB cases had already been delivered, with additional sessions planned for 2025. In their comments on the draft report, the authorities stated that two sessions had taken place in May 2025 at the Judicial Academy, with a total of 71 participants, including judges, prosecutors and investigators.

⁸⁶ https://fid.gov.lv/uploads/files/2022/1FIU_Research_THB%20and%20ML_23%20March2022.pdf, accessed on 5 May 2025.

Participants gained an understanding of the nature of the crime of THB and its different forms, the legal qualification in accordance with Section 154¹ of the CL and how to distinguish human trafficking from other criminal offences and understand the psychological and social profile of victims, the methods used to commit the offence, and the key types of evidence.

150. In 2024, the NGO Centre MARTA, in co-operation with the Court Administration, launched a training course for judges, prosecutors and police officers, focusing on gender-based violence and THB. The programme comprises approximately 160 academic hours and is scheduled to run until May 2026.

151. In addition, the Ombudsman's Office has provided training on THB to various professionals, covering child trafficking, the non-punishment provision and the case-law of the European Court of Human Rights.

152. Further, Latvian law enforcement agencies and other relevant public institutions participated in the ELECT THB project (Enhanced Law Enforcement Co-operation and Training on THB)⁸⁷ implemented from September 2021 to December 2023. The project aimed at enhancing the investigation of trafficking for sexual and labour exploitation.

153. While welcoming the attention paid by the FIU to human trafficking red flags, GRETA notes with concern the lack of proactive investigations by the Anti-Trafficking Unit of the State Police, as well as the extended duration of court proceedings in THB cases. GRETA urges the Latvian authorities to take measures to strengthen the criminal justice response to THB, including by:

- ensuring that the Anti-trafficking Unit of the State Police has sufficient human and financial resources to investigate proactively cases of trafficking in human beings;
- improving co-operation between law enforcement bodies and specialised NGOs with a view to ensuring that cases referred by NGOs to the police are properly investigated and that the police ensure a prompt and efficient investigation of THB cases.

154. GRETA also considers that the Latvian authorities should:

- ensure that human trafficking offences are proactively and promptly investigated, leading to effective, proportionate and dissuasive sanctions for those convicted;
- increase the number of specialised prosecutors assigned to THB cases;
- ensure that the length of court proceedings in cases of trafficking of human beings is reasonable, in line with the case-law of the European Court of Human Rights (related to Article 6, paragraph 1 of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ);
- continue developing the training provided to law enforcement officers, prosecutors and judges on the offence of THB and the rights of victims;
- strengthen international co-operation with relevant countries in light of reported risks of labour exploitation among Roma seasonal workers recruited for agricultural work, including through proactive information exchange, joint monitoring efforts and cross-border referral mechanisms.

⁸⁷

Project website: https://heuni.fi/-/elect_thb

c. Criminalisation of the use of services of a victim

155. Section 164, paragraph 2, of the CL criminalises the use of prostitution services from a person with the knowledge that he/she is a victim of human trafficking. The penalties envisaged for this offence are imprisonment of up to five years, temporary deprivation of liberty or probationary supervision, with or without confiscation of property.

156. Further, Section 280, paragraph 2, of the CL criminalises the employment of irregularly residing third-country nationals, including children, persons employed in particularly exploitative working conditions and victims of human trafficking, with the knowledge of their status. The penalties envisaged are deprivation of liberty for a period of up to three years, temporary deprivation of liberty, probationary supervision, public service or a fine.

157. There is no available court practice regarding Section 164, paragraph 2, of the CL and Section 280, paragraph 2, of the CL regarding victims of THB. At the same time, the police reported that in two cases where a person used the services of a victim, the person was ultimately convicted of trafficking as these were cases of sexual exploitation. No such cases have been identified with regard to labour exploitation.

158. GRETA considers that the Latvian authorities should carry out targeted information campaigns to raise awareness of the criminalisation of the use of services of trafficked persons and increase efforts to sensitise police officers and prosecutors to the importance of identifying and prosecuting persons who commit offences under Section 164, paragraph 2, and Section 280, paragraph 2, of the CL.

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

159. 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.⁸⁸ 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.

160. The Latvian authorities have observed that traffickers often target and recruit victims via social media or fake job websites. The Safer Internet Centre reported a sharp rise in reported cases of online sexual exploitation of children and the dissemination of grooming-related material. During the evaluation visit, by way of illustration, GRETA was informed of several cases, including a girl who was sexually exploited after being promised payment for a fake job, a woman lured into sexual exploitation through a modelling online advertisement, and a young woman subjected to labour exploitation after accepting a fake job online offer.

⁸⁸ 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.

161. Latvia has a national Cybersecurity Strategy for 2023-2026, developed by the Ministry of Defence, which focuses on five priority areas: 1) improvement of cybersecurity management; 2) promotion of cybersecurity and strengthening of resilience; 3) public awareness, education and research; 4) international co-operation and rule of law in cyberspace, and 5) prevention and combating of cybercrime, which includes the implementation of measures to deter cybercriminal activities and prosecute offenders.⁸⁹

162. In September 2024, to operationalise the strategy, Latvia enacted the National Cybersecurity Law, establishing that the National Cybersecurity Centre (NCSC) as the central authority for cybersecurity matters in Latvia, responsible for monitoring compliance and co-ordinating national cybersecurity efforts.

163. Established in August 2022, the Cybercrime Prevention Board (CIAP) of the State Police monitors both domestic and foreign online platforms, including social media and news portals, in relation to online crimes, and conducts internet intelligence aimed at preventing and combating cybercrime and high-technology offences, primarily targeting serious criminal offences. At the time of the visit, the Cybercrime Department employed 80 officers. Staff indicated that they had not received training specifically on THB.

164. Latvia is a party to the Council of Europe Convention on Cybercrime (Budapest Convention). However, it has not ratified the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence.

165. During the reporting period, the State Police has contributed to combating the online dissemination of child sexual abuse material through their involvement in Operation "PLATFORM". This initiative entails the continuous monitoring of the internet, the identification of victims and the seizure of data carriers containing illicit material. Furthermore, in December 2024, the State Police accessed Projectport.com, a platform facilitating information exchange and analytical collaboration among EU Member States in the field of cybercrime. The State Police also uses the INTERPOL International Child Sexual Exploitation database for cross-border co-operation and contributes to maintaining INTERPOL's list of prohibited domains.

166. In addition, State Police representatives actively participate in the annual "Violent Crimes Against Children International Task Force" meeting, organised by the U.S Federal Bureau of Investigation (FBI) to exchange information, best practices, investigative techniques and IT tools to combat online child sexual abuse between experts from 59 countries. Membership in the task force enables State Police to send requests to the FBI as part of child sexual abuse investigations, allowing them to obtain internet user information from U.S. service providers (e.g., Facebook, Google, Instagram, Snapchat, etc.) within two to three weeks. However, obtaining content-related information requires a mutual legal assistance request.

167. Several awareness campaigns were carried out in Latvia during the reporting period: in 2022, "Dangerous Online Friendships,"⁹⁰ launched by the Safer Internet Centre, the State Police, and the Child Protection Centre, and targeting children, young adults, parents and educators. It involved a self-assessment tool (test) aimed to evaluate the safety of children's online friendships, providing guidance on identifying signs of child grooming on the internet, and offering information on where to seek assistance. Another campaign run in February 2022 was "I Choose to Speak,"⁹¹ which was implemented by the helpline 116111, aimed to raise awareness about children's internet safety, with a focus on emotional abuse and cyberbullying. Further, in November 2023, the helpline implemented the campaign

⁸⁹ mod.gov.lv, accessed on 5 May 2025.

⁹⁰ Since February 2022, 10,752 individuals have completed the test (9,954 children, 195 specialists working with children, and 603 parents). More information available at: <https://www.bti.gov.lv/lv/jaunums/informes-par-socialas-kampanas-bistama-draudziba-interneta-saksanos>, accessed on 5 May 2025.

⁹¹ More about the campaign: https://www.bti.gov.lv/lv/jaunums/notiks-informativa-kampana-par-bernu-drosibu-interneta?utm_source=https%3A%2F%2Fwww.google.com%2F, accessed on 5 May 2025.

"Break the Silence!"⁹² focused on sexual violence, encouraging affected individuals to seek psycho-emotional and informational support.

168. In 2022, the Ombudsman launched the social media campaign "Not all that glitters is gold!" (*Ne viss ir zelts, kas spīd!*) to raise awareness on THB in the digital environment among the general public. The campaign illustrated through eight fictional stories how individuals can be lured into trafficking via deceptive online job offers and dating scams, highlighting vulnerabilities in the digital environment and promoting public awareness to recognise and avoid such risks. The materials were mainly published on the Ombudsman's social media accounts and website. In the campaign, the Ombudsman called for "red flags" or warning words and phrases. As a result of the campaign, an informative educational material⁹³ on the risks of THB in the digital environment was developed.

169. From May 2018 to December 2024, the State Police was involved in the international prevention project "IWOL", which brought together organisations and Internet Service Providers (ISP) to filter, identify and restrict access to child sexual abuse materials in Latvia. Within this project, domain names with prohibited content were blocked in the Latvian IP address segment, resulting in more than 7 700 000 access attempts being blocked annually. The list of prohibited sites included more than 5 768 constantly changing domains containing child sexual abuse materials. The project engaged Latvia's eight largest ISPs, including Lattelecom (TET), Baltcom, Latnet, Dautkom, LMT, Telia, Telenet and Bite, covering over 2 million Latvian subscribers. In December 2024, CERT.LV took over the IWOL project from the State Police, which remained as an observer and co-operative partner.

170. Co-ordinated by the Latvian Internet Association, the Latvian Safer Internet Centre educates children, adolescents, teachers and parents about online safety and online threats. Key activities include combating harmful online content, including ICT-related sexual abuse,⁹⁴ developing educational materials, organising seminars and conducting social campaigns on current online safety issues. The Latvian Safer Internet Centre operates a hotline (drossinternets.lv) allowing users to anonymously report illegal content, including child sexual exploitation material and online grooming.⁹⁵ Reports are reviewed and processed in co-operation with the State Police and ISPs. Typically, the Centre informs the police, who then engage with the relevant ISP. If the State Police does not respond within five days, the Centre contacts the ISPs directly. The hotline is part of the INHOPE Association of hotlines and it is financially supported by the Ministry of Defence and the cyber incident response institution.

171. Furthermore, schools educate pupils about internet safety, media literacy and cyberbullying issues, including how to critically evaluate online information. Teaching tools and methodological materials developed to enhance media literacy among children are available online for teachers, parents and individuals seeking to improve their media literacy skills.⁹⁶ The State Police Prevention Unit also carried out educational activities in secondary and primary schools, including on internet safety. In 2021, 238 activities were conducted, followed by 332 in 2022 and 400 in 2023, each engaging an average of 25 students. Overall, these activities reached approximately 20% of the student population in Latvia.

⁹² More information available at: <https://www.bti.gov.lv/lv/jaunums/uzticibas-talrunis-116111-uzsak-akciju-seksualas-wardarbibas-mazinasanai-0>, accessed on 5 May 2025.

⁹³ https://www.tiesibsargs.lv/wp-content/uploads/2023/01/ne_viss_ir_zelts_kas_spid_apkopojums.pdf

⁹⁴ More information available at: <https://drossinternets.lv/en>, accessed 7 May 2025.

⁹⁵ In 2021, the number of reports was 23,758, in 2022 - 10,468, in 2023 - 1,920, and in 2024 - 12,760. The majority of reports concerned child sexual abuse images, followed by cyberbullying, hate speech and racism.

⁹⁶ All materials are accessible at: <https://datubaze.nep.lp.lv/datubaze>, accessed on 5 May 2025.

172. In 2020, State Police officials took part in a training organised by the Organisation for Security and Co-operation in Europe (OSCE) on the effective use of technology to combat sexual exploitation and THB, as well as in training sessions provided by CEPOL.⁹⁷ Further, in 2023, two prosecutors participated in training organised by CEPOL on the use of social media in THB detection and investigations. According to the Safer Internet Centre, staff of the Child Protection Department are trained by them once a year on harmful online content, including ICT-related sexual abuse.

173. While welcoming the efforts made to strengthen online safety and prevent risks of ICT-facilitated trafficking in human beings, GRETA considers that the Latvian authorities 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 on trafficking cases. In this context, there is a need for targeted training on THB for the Cybercrime Prevention Board, to enhance their ability to detect and respond effectively to technology-facilitated forms of exploitation.

174. GRETA also invites the Latvian authorities to ratify the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence.

V. Follow-up topics specific to Latvia

1. Compensation (Article 15)

175. In its third evaluation report, while noting the gradual increase in the number of victims who claimed and received state compensation, GRETA was concerned that, in practice, effective access of victims of trafficking to compensation remained sporadic. GRETA urged the Latvian authorities to make full use of the legislation on the freezing and forfeiture of assets and of international co-operation in order to secure compensation to victims of THB, as well as to include the topic of compensation in the training programmes for lawyers, prosecutors and judges.⁹⁸

176. The legal framework for claiming compensation from the perpetrators and/or from the state remains as described in GRETA's second and third reports.⁹⁹ A victim has the right to submit an application regarding compensation at any stage of the criminal proceedings before the first instance court hearing. The victim must provide justification of the financial and material losses suffered.

177. According to information received, the verdicts in THB cases which were provided to GRETA generally lack information about compensation awards. During the evaluation visit, GRETA was informed that in one court decision, two traffickers were ordered to pay EUR 9 000 in moral damages to a victim of THB. The court set a deadline of 30 days and required the submission of documentation confirming the payment. The convicted person filed an appeal in cassation, which was declined by the Supreme Court, and the decision of the Court of Appeal remained unchanged.

178. In their comments on the draft report, the authorities indicated that the Court Administration plans to introduce in 2026 a system for recording data on the compensation amounts awarded to victims of THB in judgments and the sums subsequently received.

⁹⁷ In 2019 on "Financial Investigation related to THB" and "Investigation of THB as a Cyber-enabled Crime"; in 2022 on "Trafficking in Human beings — Investigation of the Digital Business Model", in 2023 on "Trafficking in Human beings for the Purpose of Sexual exploitation in the Digital age," and in 2024 on "Investigation of the Internet Digital Business Model of Trafficking in Human Beings".

⁹⁸ See GRETA's third evaluation report on Latvia, paragraph 73.

⁹⁹ See paragraph 146 of GRETA's second report and paragraphs 60 to 70 of GRETA's third report on Latvia.

179. As noted in GRETA's third report, the Law on State Compensation to Crime Victims was amended in 2018 (in force from 1 January 2019) to increase the maximum amount of state compensation to be paid to victims of THB from 70% to 90% of five minimum monthly wages (which was the equivalent of EUR 2 500 in 2022, EUR 2 730 in 2023, EUR 3 155 in 2024 and EUR 3 330 in 2025).¹⁰⁰ As of 1 January 2025, the scope of the Law on State Compensation to Victims has been expanded to include persons who have suffered harm as a result of criminal offences committed through negligence. These victims are now entitled to receive state compensation in the same amount as those harmed by intentional criminal offences.

180. According to information provided by the authorities, state compensation was awarded to 14 victims of THB in 2021 (amounting to EUR 29 295 in total), 10 victims in 2022 (amounting to EUR 20 250), five victims in 2023 (amounting to EUR 11 790), and four victims in 2024 (amounting to EUR 10 620), with the highest individual award amounting to EUR 3 150, in 2024. As soon as the Court Administration makes a decision on compensation, the amount is transferred to the victim's bank account within a few days. If the bank account is not valid, a notification is received.

181. Although a Fund of the Proceeds of Crime from Confiscation exists under the management of the Ministry of Justice, with an annual allocation of EUR 2 million, it was never used to pay compensation to victims of THB. The fund was established to support efforts to combat economic and financial crimes.¹⁰¹ Ministries and national institutions may apply for funding to enhance the fight against such crimes and to strengthen support for victims of crime, including victims of THB. NGOs can also be recipients of this funding. Activities that should be covered by the regular State budget are not eligible for support. According to the authorities, the fund has been used once to finance a Ministry of the Interior initiative for an information campaign, which included the distribution of leaflets at airports.

182. According to the Latvian authorities, the topic of compensation was included in a training session for judges in September 2023. This training was organised by the Latvian Judicial Training Centre in co-operation with the Ministry of the Interior. Furthermore, the Centre MARTA conducted research and published a Handbook for Social Sector Professionals on the Procedures for Granting and Receiving Compensation for Victims of Sexual Violence,¹⁰² which was used to inform THB victims on compensation.

183. While noting positively the increase in the number of victims that were awarded state compensation, GRETA once again urges the Latvian authorities to take further steps to facilitate and guarantee access to compensation for victims of THB from the perpetrators, in particular by:

- enabling all victims of trafficking to effectively exercise their right to compensation from the perpetrators in criminal proceedings;
- making full use of the legislation on the freezing and forfeiture of assets to secure compensation to victims of THB and ensuring that recoverable property which is seized in criminal proceedings is returned as soon as possible to the victim or used to compensate the victim.

184. Further, GRETA considers that the Latvian authorities should:

- continue providing training on the topic of compensation to lawyers, prosecutors and the judiciary, and encourage them to use all the possibilities the law offers to uphold compensation claims by victims of THB;

¹⁰⁰ See GRETA's third evaluation report on Latvia, paragraph 67.

¹⁰¹ <https://likumi.lv/ta/en/en/id/296013-procedures-for-the-use-of-the-funds-of-the-basic-budget-programme-of-the-ministry-of-justice-fund-of-the-proceeds-of-crime-from-confiscation>, accessed on 25 April 2025.

¹⁰² <https://marta.lv/files/research/FAIRCOM%20HANDBOOK%20Latvian.pdf>

- take steps to enable access to compensation for victims of trafficking by making compensation awarded in criminal proceedings payable by the State, and the State taking the responsibility to recover the amount from the offender;
- ensure the systematic recording of data concerning compensation awarded to victims of THB by court decisions.

2. Recovery and reflection period (Article 13)

185. The legal provisions concerning the recovery and reflection period have not changed since the previous GRETA evaluation. Pursuant to the Law on Residence of Victims of Trafficking in Human Beings, the recovery and reflection period is limited to third-country nationals who have no legal basis to reside in Latvia with a view to preventing their expulsion. If a third-country national provides information that might assist in the disclosure of a case of THB, but there is not enough information to justify opening criminal proceedings, the State Border Guard, investigative institution or social service provider shall inform the third-country national in writing of the possibility to be granted a recovery and reflection period, along with the associated rights.¹⁰³

186. In 2024, the Ministry of the Interior organised a meeting with representatives of the Ministry of Justice, the Prosecutor's Office and the Ombudsman's Office to discuss the application of the recovery and reflection period. Prior to the meeting, consultations were also held with the State Police. The meeting concluded that the current legal framework may not fully align with the objectives of Article 13 of the Convention.

187. The authorities provided the following statistical data concerning the number of victims who were granted a recovery and reflection period during the reporting period: one victim from Tajikistan in 2023, five victims from Tajikistan in 2024 and two victims in 2025, one from India and one from Uzbekistan.

188. Further, GRETA was informed that three male victims (one from Tajikistan in 2023 and two from India in 2024) were granted residence permits as victims of THB based on Article 23, paragraph 6 of the Immigration Law.

189. Referring to its 2024 Guidance Note on the recovery and reflection period,¹⁰⁴ GRETA once again urges the Latvian authorities to review the legal provisions on the recovery and reflection period in order to comply with Article 13 of the Convention, ensuring that all possible foreign victims of trafficking, including EU and EEA citizens, are effectively offered a recovery and reflection period and all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention during this period.

3. Protection of victims and witnesses

190. As noted in GRETA's third report on Latvia,¹⁰⁵ the status of "specially protected victim", which applies to victims of THB, including children, is provided for in Section 96.1 of the CPL. This status entitles victims to a set of enhanced procedural safeguards, including the possibility to be interviewed without being physically present, through the use of communication technologies; to be questioned in a separate room by a person of the same sex; to be accompanied by a trusted person during procedural activities; and to request and receive information about detained or sentenced perpetrators responsible for harm

¹⁰³ See GRETA's third evaluation report on Latvia, paragraph 210.

¹⁰⁴ <https://rm.coe.int/guidance-note-on-recovery-and-reflection-period-group-of-experts-on-ac/1680b1a3ca>

¹⁰⁵ See GRETA's third evaluation report on Latvia, paragraph 103.

caused to them. Latvian legislation further stipulates that a person may be granted this status at any stage of the proceedings, should the relevant circumstances or assessments evolve.

191. Further, Section 152 of the CPL provides for protection measures specifically directed to child victims and witnesses during interviews (including audio-visual recording of the interviews and limits on their duration). In their comments on the draft report, the authorities stated that on 19 September 2024, amendments to the CPL were adopted, strengthening the principles of Section 153 of the CPL (“special features of interrogation of a specially protected minor victim”). This section now establishes that “interrogation of a minor who has been recognised as a victim of violence committed by a person upon whom the victim is dependent financially or otherwise, as a victim of human trafficking, or a criminal offence directed against morality or sexual inviolability of the person shall be conducted with the intermediation of technical means and a psychologist.”¹⁰⁶ In emergency cases when this is not possible, the child may be interrogated by a specialised investigator trained on communication with a child during criminal proceedings.

192. The Latvian authorities stated that, in order to avoid secondary victimisation, victims are generally exempted from testifying in court if their statements have already been recorded during the pre-trial phase. The State Police Anti-Trafficking Unit reportedly routinely avoids THB victims confronting or meeting anyone accused of trafficking them. However, when cases go to court, victims and witnesses may be cross-examined by defendants or their lawyers.

193. According to NGOs met by GRETA, in child sexual exploitation cases, judges summon child victims to testify multiple times, disregarding psychologists’ advice.

194. There have been no instances of victims of THB benefiting from special protection measures during the reporting period.

195. GRETA welcomes the amendment of Section 153 of the Criminal Procedure Law and considers that the Latvian authorities should ensure that, in practice, the best interests of the child are the primary consideration in all proceedings relating to child victims of THB and to avoid, as far as possible, the repeated summoning of child victims of THB.

¹⁰⁶ Unofficial translation provided by the authorities.

VI. Conclusions

196. Since the publication of GRETA's third report on Latvia on 21 February 2022, progress has been made in a number of areas covered by that report.

197. A new National Action Plan against Trafficking in Human Beings, covering the period 2025-2027, was adopted on 26 August 2025. The authorities have continued to provide training and guidance to professionals involved in the fight against trafficking and there are plans to develop a comprehensive law on the protection of victims of trafficking.

198. GRETA welcomes these positive developments in Latvia. 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 Latvian authorities to take action in the following areas:

- Assistance to victims (Article 12 of the Convention). The Latvian authorities should ensure that state funding for the social rehabilitation programme for victims of THB is sufficient to cover the needs of all victims, including their access to appropriate and safe accommodation, for the duration necessary to achieve their recovery, and regardless of the victim's willingness to co-operate in criminal proceedings.
- Compensation (Article 15 of the Convention). The Latvian authorities should enable all victims of trafficking to effectively exercise their right to compensation from the perpetrators in criminal proceedings, and make full use of the legislation on the freezing and forfeiture of assets to secure compensation to victims of THB.
- Recovery and reflection period (Article 13 of the Convention). The Latvian authorities should review the legal provisions on the recovery and reflection period, ensuring that all possible foreign victims of trafficking, including EU and EEA citizens, are effectively offered a recovery and reflection period and all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention during this period.

199. 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.

200. As regards the thematic focus of the fourth evaluation round, which is on vulnerabilities to trafficking in human beings, the Latvian authorities have acknowledged that migrant workers, Latvian nationals who migrate abroad for work, persons affected by substance abuse, homelessness or extreme socio-economic deprivation, and children, especially those in or leaving institutional care, are particularly vulnerable.

201. While welcoming the measures taken by the Latvian authorities to prevent human 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:

- increase the efforts to prevent trafficking of children transitioning out of institutional care by strengthening the available support and ensuring that it is available across municipalities;
- take immediate and targeted action to remedy the deficiencies in the care and protection of unaccompanied and separated children by ensuring the allocation of adequate resources to municipalities to provide individualised support and child-friendly services, in full compliance with the best interests of the child;

- ensure that an individual vulnerability assessment is systematically carried out in respect of all asylum seekers accommodated in reception centres by staff of the Office of Citizenship and Migration Affairs, as well as persons detected at the Latvian-Belarusian border by State Border Guard officials, with a view to identifying individual vulnerabilities and needs, and respecting the *non-refoulement* principle;
- prevent human trafficking of migrant workers, in particular by ensuring that sufficient staff, resources and training are made available to the State Labour Inspectorate to enable it to contribute to the prevention and detection of THB for labour exploitation;
- take sustained social, economic and other measures for the Roma community, including by promoting their access to education and the labour market and by providing accessible information on safe migration, workers' rights and available support services, in co-operation with Roma mediators, civil society and community-based organisations.

202. Furthermore, the Latvian authorities should take further steps to improve the identification of victims of trafficking for all forms of exploitation, including by providing further training and guidance to relevant officials, and adopting binding protocols for the identification of trafficking victims amongst unaccompanied and separated children.

203. The Latvian authorities should also take measures to strengthen the criminal justice response to THB, including by ensuring that the Anti-trafficking unit of the State Police has sufficient human and financial resources to investigate proactively cases of trafficking in human beings, and by improving co-operation between law enforcement bodies and specialised NGOs.

204. GRETA welcomes the efforts made to strengthen online safety and prevent trafficking in human beings facilitated by ICT. In order to address the routine use of ICT to recruit and exploit victims of trafficking, the Latvian authorities should develop further measures specifically aimed at preventing ICT-facilitated trafficking in human beings, including by investing in capacity building and digital tools to conduct proactive investigations on trafficking cases. In this context, there is a need for targeted training on THB for the Cybercrime Prevention Board, to enhance their ability to detect and respond effectively to technology-facilitated forms of exploitation.

205. GRETA invites the Latvian authorities 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 Latvia 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 Latvian authorities and civil society.

Appendix 1

Table with statistics on victims and cases of THB in Latvia in 2021-2024

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

| Indicator | | Years | | | |
|---|-----------------------|--|--|--|--|
| | | 2021 | 2022 | 2023 | 2024 |
| Number of identified victims (by the Police or the multi-disciplinary commission) | | 61 | 26 | 24 | 38 |
| By: | | | | | |
| Sex and age group | Women | 13 | 19 | 11 | 19 |
| | Men | 48 | 7 | 13 | 19 |
| | Girls | 0 | 1 | 1 | 2 ¹⁰⁷ |
| | Boys | 0 | 0 | 0 | 2 |
| Nationality | Latvian | 59 | 22 | 13 | 21 |
| | Foreigners | 2 | 4 | 11 | 17 |
| Type of exploitation | Sexual | 7 | 10 | 4 | 9 |
| | Labour | 53 | 10 | 15 | 16 |
| | Sham marriages | 1 | 5 | 1 | 4 |
| | Others ¹⁰⁸ | 0 | 1 | 4 | 9 |
| Number of investigations | | 4 cases (A.154 ¹) involving 17 victims and two cases (A.165 ¹) involving 2 victims | 8 cases (A.154 ¹) involving 11 victims | 2 cases involving 4 victims | 3 cases involving 5 victims (incl. 2 boys and 2 girls) |
| Number of prosecutions | | 2 cases involving 9 victims (7 men and 2 women) | 2 cases involving 6 male victims | 2 cases involving 4 victims (1 man and 2 women and 1 girl) | 2 cases involving 16 victims |
| Number of convictions (persons) | | 1 man | 8 (3 men and 5 women) | 5 (2 men and 3 women) | 1 person |

¹⁰⁷ One female victim, detected as a victim of THB at the Asylum Centre in 2024 and identified as a child victim of trafficking by the multi-disciplinary commission, is not included here as it was later confirmed that she was an adult.

¹⁰⁸ The term "other forms of exploitation" encompasses a variety of exploitative practices, including forced criminality and forced begging often in conjunction with financial fraud as well as drug trafficking.

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

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

Children and young people

- GRETA considers that the Latvian authorities should take further steps to reduce the vulnerability of children to human trafficking, including by:
 - increasing their efforts to prevent trafficking of children transitioning out of institutional care by strengthening the support provided to them and ensuring that it is available across municipalities;
 - continuing to raise awareness of children, parents and caregivers of the risks of human trafficking (including recruitment and abuse through Internet/social networks), paying particular attention to children in vulnerable situations, including children living in or transitioning from residential care;
 - mainstreaming the prevention of child trafficking by including it in the general school curriculum;
 - continuing to provide training on trafficking in human beings to all relevant professionals working with children, including teachers, employees of the Orphan's and Custody Courts, staff of child residential institutions and 116111 helpline staff (paragraph 36).

Vulnerabilities related to the gender dimension of human trafficking

- While welcoming the measures taken to advance gender equality, GRETA considers that the Latvian authorities should take further steps to prevent THB through initiatives aimed at eliminating sexual and gender stereotypes and reducing the risks of exploitation of women and girls in prostitution, including by raising awareness among them about the risks of human trafficking and the support services available to victims, developing exit programmes for those wishing to leave prostitution, and adopting relevant legislation (paragraph 43).

Migrant workers

- GRETA considers that the Latvian authorities should take further steps to prevent THB of migrant workers, in particular by:
 - ensuring that sufficient staff, resources and training are made available to the State Labour Inspectorate to enable it to contribute to the prevention and detection of THB for labour exploitation;
 - developing co-operation with trade unions in the prevention of THB for the purpose of labour exploitation (paragraph 55).

Asylum seekers, refugees and irregular migrants

- While welcoming the implementation of the “one-stop shop” initiative and the steps taken to prevent vulnerabilities to THB among displaced persons from Ukraine, GRETA urges the Latvian authorities to take further measures to prevent asylum seekers and refugees from becoming victims of trafficking in human beings, in particular by:
 - taking immediate and targeted action to remedy the deficiencies in the care and protection of unaccompanied and separated children by ensuring the allocation of adequate resources to municipalities to provide individualised support and child-friendly services, in full compliance with the best interests of the child (see also the recommendation in paragraph 123);
 - sensitising professionals involved in the registration process of asylum seekers to the vulnerabilities that lead to THB;
 - ensuring that an individual vulnerability assessment is systematically carried out in respect of all asylum seekers accommodated in reception centres by staff of the Office of Citizenship and Migration Affairs, as well as persons detected at the Latvian-Belarusian border by State Border Guard officials, with a view to identifying individual vulnerabilities and needs, and respecting the *non-refoulement* principle (paragraph 76);
- Further, GRETA considers that the Latvian authorities should provide further training on human trafficking to staff of the State Border Guard, the State Police, the Office of Citizenship and Migration Affairs and any other relevant professionals involved in the asylum procedure (paragraph 77).

Disadvantaged minorities

- While welcoming the plans to promote the inclusion of Roma, GRETA considers that the Latvian authorities should continue strengthening the prevention of THB among the Roma community, in particular by:
 - taking sustained social, economic and other measures for the Roma community, including by promoting their access to education and the labour market;
 - conducting targeted awareness raising within the Roma community concerning the risks of THB and by providing accessible information on safe migration, workers' rights and available support services, in co-operation with Roma mediators, civil society, and community-based organisations (paragraph 86).

Persons with disabilities

- GRETA considers that the Latvian authorities should:
 - provide training on trafficking in human beings to all staff interacting with persons with disabilities, including children, which emphasises the identification of risk factors and early detection of trafficking indicators;
 - enhance access to inclusive, community-based services adapted to the needs of persons with disabilities to mitigate their exposure to risks of trafficking;
 - guarantee adequate state-funded support for families with children with disabilities and ensure that facilities and institutions accommodating persons with disabilities are sufficiently resourced and staffed to meet the needs of the beneficiaries as a preventive measure to mitigate their exposure to risks of trafficking (paragraph 93).

Homeless people

- GRETA invites the Latvian authorities to:
 - ensure that homeless people are provided with accommodation and access to essential services, in a manner that prevents them from becoming victims of THB and exploitation;
 - continue their efforts towards the prevention of trafficking in human beings among homeless people, including by collecting national data about it (paragraph 100).

Identification of victims of THB

- GRETA urges the Latvian authorities to take further steps to improve the identification of victims of trafficking for all forms of exploitation, including by:
 - providing further training and guidance to law enforcement officials, social workers, health-care staff and other frontline professionals to ensure the timely identification of victims of trafficking and their referral to support services, regardless of whether criminal proceedings are initiated;
 - ensuring that law enforcement officials and social workers adopt a more proactive approach and increase their outreach work to identify victims of human trafficking for the purpose of sexual exploitation;
 - ensuring that a proper vulnerability assessment is systematically carried out in respect of all asylum seekers by staff of the Office of Citizenship and Migration Affairs, and that it includes the detection of possible indicators of trafficking in human beings (see also the recommendation in paragraph 76);
 - adopting binding protocols for the identification of trafficking victims amongst unaccompanied and separated children;
 - putting an end to the detention for immigration purposes of unaccompanied and separated children older than 14 and seeking alternatives to detention, in line with the best interests of the child (paragraph 112);
- GRETA considers that the Latvian authorities should:
 - formalise without further delay a National Referral Mechanism which defines the procedures, roles and responsibilities of all frontline actors who may come into contact with victims of trafficking;
 - put in place a procedure for the identification of victims of trafficking among irregular migrants, fully assessing the risks of trafficking or re-trafficking on return. In this context, full consideration should be given to the UNHCR's Guidelines on the application of the Refugees Convention to trafficked persons and GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection;
 - provide training on the identification of victims of trafficking amongst asylum seekers and detained migrants to staff of the State Border Guards, the State Police, the Office of Citizenship and Migration Affairs and other relevant professionals involved in the identification of victims of trafficking in human beings;
 - strengthen the identification of child victims of THB by ensuring the effective use of specific indicators, enhancing the training of professionals likely to come into contact with child victims, and reinforcing the child protection system's capacity to detect trafficking among children in vulnerable situations, such as those transitioning out of institutional or foster care (paragraph 113).

Assistance to victims

- GRETA once again urges the Latvian authorities to:
 - ensure that state funding for the social rehabilitation programme for victims of THB is sufficient to cover the needs of all victims, including their access to appropriate and safe accommodation, for the duration necessary to achieve their recovery, and regardless of the victim's willingness to co-operate in criminal proceedings;
 - ensure the provision of adequate support and services tailored to the specific needs of child victims of trafficking, with particular attention to unaccompanied and separated children, especially in the context of asylum procedures. This includes the provision of suitable and child-friendly accommodation and access to specialised assistance and psychosocial support in line with the best interests of the child (paragraph 123);
- GRETA considers that the Latvian authorities should provide safe and suitable accommodation for male victims of THB (paragraph 124).

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

- GRETA welcomes the application of the concept of abuse of a position of vulnerability in Latvian case-law and invites the Latvian authorities to continue providing investigators, prosecutors and judges with training and guidance on recognising the existence or emergence of a victim's position of vulnerability, as well as understanding how such vulnerability may be exploited in the context of THB (paragraph 135).

Investigations, prosecutions and sanctions

- While welcoming the attention paid by the FIU to human trafficking red flags, GRETA notes with concern the lack of proactive investigations by the Anti-Trafficking Unit of the State Police, as well as the extended duration of court proceedings in THB cases. GRETA urges the Latvian authorities to take measures to strengthen the criminal justice response to THB, including by:
 - ensuring that the Anti-Trafficking Unit of the State Police has sufficient human and financial resources to investigate proactively cases of trafficking in human beings;
 - improving co-operation between law enforcement bodies and specialised NGOs with a view to ensuring that cases referred by NGOs to the police are properly investigated and that the police ensure a prompt and efficient investigation of THB cases (paragraph 153);
- GRETA also considers that the Latvian authorities should:
 - ensure that human trafficking offences are proactively and promptly investigated, leading to effective, proportionate and dissuasive sanctions for those convicted;
 - increase the number of specialised prosecutors assigned to THB cases;
 - ensure that the length of court proceedings in cases of trafficking of human beings is reasonable, in line with the case-law of the European Court of Human Rights (related to Article 6, paragraph 1 of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ);
 - continue developing the training provided to law enforcement officers, prosecutors and judges on the offence of THB and the rights of victims;

- strengthen international co-operation with relevant countries in light of reported risks of labour exploitation among Roma seasonal workers recruited for agricultural work, including through proactive information exchange, joint monitoring efforts and cross-border referral mechanisms (paragraph 154).

Criminalisation of the use of services of a victim

- GRETA considers that the Latvian authorities should carry out targeted information campaigns to raise awareness of the criminalisation of the use of services of trafficked persons and increase efforts to sensitise police officers and prosecutors to the importance of identifying and prosecuting persons who commit offences under Section 164, paragraph 2, and Section 280, paragraph 2, of the CL (paragraph 158).

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

- While welcoming the efforts made to strengthen online safety and prevent risks of ICT-facilitated trafficking in human beings, GRETA considers that the Latvian authorities 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 on trafficking cases. In this context, there is a need for targeted training on THB for the Cybercrime Prevention Board, to enhance their ability to detect and respond effectively to technology-facilitated forms of exploitation (paragraph 173);
- GRETA invites the Latvian authorities to ratify the Second Additional Protocol to the Convention on Cybercrime on enhanced co-operation and disclosure of electronic evidence (paragraph 174).

Follow-up topics specific to Latvia

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

- While welcoming the work carried out by the National Anti-Trafficking Co-ordinator, GRETA considers that the Latvian authorities should increase the human resources to enable the carrying out of the range of tasks involved and strengthen the co-ordination of national anti-trafficking action (paragraph 14);
- GRETA considers that the Latvian authorities should reactivate the Inter-Institutional Working Group on Combating Human Trafficking and ensure that it meets regularly and is given a clear mandate to support strategic decision-making and co-ordination (paragraph 15);
- GRETA considers that the Latvian authorities should designate as a National Rapporteur a separate organisational entity or another independent mechanism for monitoring the anti-trafficking activities of State institutions, supported by sustainable funding to guarantee its long-term effectiveness and autonomy (paragraph 16);
- GRETA considers that the authorities should commission independent evaluations of National Action Plans against Trafficking in Human Beings as a tool for assessing the impact of the activities and for planning future policies and measures to combat THB (paragraph 18).

Compensation

- GRETA once again urges the Latvian authorities to take further steps to facilitate and guarantee access to compensation for victims of THB from the perpetrators, in particular by:
 - enabling all victims of trafficking to effectively exercise their right to compensation from the perpetrators in criminal proceedings;
 - making full use of the legislation on the freezing and forfeiture of assets to secure compensation to victims of THB and ensuring that recoverable property which is seized in criminal proceedings is returned as soon as possible to the victim or used to compensate the victim (paragraph 183);
- Further, GRETA considers that the Latvian authorities should:
 - continue providing training on the topic of compensation to lawyers, prosecutors and the judiciary, and encourage them to use all the possibilities the law offers to uphold compensation claims by victims of THB;
 - take steps to enable access to compensation for victims of trafficking by making compensation awarded in criminal proceedings payable by the State, and the State taking the responsibility to recover the amount from the offender;
 - ensure the systematic recording of data concerning compensation awarded to victims of THB by court decisions (paragraph 184).

Recovery and reflection period

- Referring to its 2024 Guidance Note on the recovery and reflection period, GRETA once again urges the Latvian authorities to review the legal provisions on the recovery and reflection period in order to comply with Article 13 of the Convention, ensuring that all possible foreign victims of trafficking, including EU and EEA citizens, are effectively offered a recovery and reflection period and all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention during this period (paragraph 189).

Protection of victims and witnesses

- GRETA welcomes the amendment of Section 153 of the Criminal Procedure Law and considers that the Latvian authorities should ensure that, in practice, the best interests of the child are the primary consideration in all proceedings relating to child victims of THB and to avoid, as far as possible, the repeated summoning of child victims of THB (paragraph 195).

Appendix 3

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

Public bodies

- Ministry of the Interior
 - National Anti-Trafficking Co-ordinator
 - State Police
 - State Border Guard
 - Office of Citizenship and Migration Affairs
- Ministry of Justice
 - Justice Academy
- Ministry of Welfare
 - State Labour Inspectorate
 - State Employment Agency
- Ministry of Culture
- Ministry of Education and Science
- Ministry of Health
- Ministry of Foreign Affairs
- Financial Intelligence Unit
- Child Protection Centre
- Social Integration Foundation
- General Prosecutor's Office
- Supreme Court
- Court Administration
- Riga Municipality Welfare Department
- Riga's Orphan's and Custody Court
- Ropaži's Custody Court
- Ombudsman's Office
- Latvian Parliament

Intergovernmental organisations

- International Organization for Migration (IOM)
- United Nations High Commissioner for Refugees (UNHCR)

NGOs and other civil society organisations

- Centre Dardedze
- Centre MARTA
- Construction sector workers Trade Union
- Free Trade Union Confederation of Latvia (LBAS)
- I Want to Help Refugees
- Lighthouse Transition Care
- Public services and transport sector workers trade union (LAKRS)
- Safer Internet Centre (Latvian Internet Association)
- Salvation Army
- Shelter "Safe House"
- Women's NGOs Co-operation Network

Government's comments

The following comments do not form part of GRETA's analysis concerning the situation in Latvia

GRETA engaged in a dialogue with the Latvian authorities 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 Latvian authorities on 11 December 2025 and invited them to submit any final comments. The comments of the authorities, submitted on 16 January 2026, are reproduced hereafter.



Iekšlietu ministrija

MINISTRY OF THE INTERIOR OF THE REPUBLIC OF LATVIA

Čiekurkalna 1. līnija 1 k-2, Rīga, LV-1026, Latvia, phone +371 67219263; e-mail: pasts@iem.gov.lv; www.iem.gov.lv

Rīga

16.01.2026

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Council of Europe
Group of Experts on Action against Trafficking in Human Beings (GRETA)
Directorate General of Democracy and Human Dignity
F-67075 Strasbourg Cedex
France

Email: Trafficking@coe.int

**The Comments by the Latvian authorities on the
GRETA report (fourth evaluation round)**

Latvian authorities would like to express their gratitude to the GRETA experts for preparing a high-quality report within the fourth evaluation round on the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings in Latvia. The authorities would like to reiterate that GRETA reports are regarded as an independent expert evaluation and are actively used to improve national policies and practical measures to combat trafficking in human beings. Latvia remains fully committed to providing all necessary support to GRETA in carrying out its evaluation mandate.

In this context, the Latvian authorities would like to provide minor comments and clarifications to the evaluation report.

Paragraph 67

It should be noted that the statement that “border areas in Latvia are not accessible to NGOs” may give an inaccurate impression. The Latvian authorities would like to clarify that access restrictions to border areas are not specifically targeted at non-governmental organisations. The border with Belarus constitutes the external

border of the European Union, and access to this area is therefore regulated. During the period of the special emergency state, access restrictions may be further tightened for security reasons. In practice, non-governmental organisations may provide services in border areas; however, such activities must be coordinated in advance with the State Border Guard.

Paragraphs 181 and 182

Paragraphs 181 and 182 refer to the Fund of the Proceeds of Crime from Confiscation. However, its placement under the section on compensation may create the impression that the Fund is intended to compensate victims. The Fund is designed to provide project-based funding to state institutions, primarily law enforcement authorities, in order to support measures aimed at combating economic and financial crime. In this regard, the Latvian authorities consider that information concerning the Fund would be more appropriately reflected under capacity-building activities, rather than as a source of victim compensation. The authorities would also like to clarify that non-governmental organisations cannot receive funding directly from the Fund. Funding may be allocated only to state institutions, which may subsequently contract NGOs for the implementation of specific tasks.

Deputy State Secretary



Jānis Bekmanis