

**Voices of trafficking survivors:
Key comments on the draft
Law on the suppression
of human trafficking
and the protection of victims**



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Background and rationale

In 2025, a Draft Law on suppression of human trafficking and the protection of victims was prepared in the Republic of Serbia, with the Ministry of the Interior acting as the proposing authority. The Draft Law was developed as part of the Republic of Serbia's 2024-2027 EU Reform agenda and submitted to the European Commission. After this step was completed, it was given to the competent ministries for comment. Its adoption by the National Assembly of the Republic of Serbia is expected in 2026.

Although the law is still in draft form, it is essential that its understanding, consideration, and improvement include those directly affected by this problem, survivors of human trafficking. Their experiences, perceptions, and assessments constitute a crucial corrective factor to institutional and normative solutions, as they illuminate how the law “will live in practice” and to what extent it can respond to the real needs of victims.

It is important to emphasize that this is not an isolated initiative, but part of the long-standing work of NGO Atina to improve the participation of trafficking survivors in decision-making processes. Atina has been applying this approach since 2009, when survivors actively participated in developing minimum standards for assisted housing services, laying the foundations for a model grounded in experiential knowledge. This approach has evolved, and since 2018, through the establishment of Advocacy groups of survivors, it has consistently contributed to Atina's work, from shaping reports to opening the dialogues with decision-makers. This initiative represents another step in NGO Atina's efforts to ensure that trafficking survivors have greater opportunities to contribute, greater visibility, and a genuine voice in processes that shape the protection system. It also aims to ensure that this law is applicable, practical, and grounded in survivors' lived experiences rather than in normative assumptions alone.

To that end, NGO Atina brought together nine women who have been formally identified as victims of human trafficking so that they could provide their suggestions on the Draft Law. Two focus groups were organized: the first comprised women from migrant communities, and the second comprised Serbian nationals. This approach enabled consideration of the different positions, risks, and barriers that women face depending on their status, origin, and prior experiences with institutions.

The discussions were not aimed at legal analysis of the text, but at understanding it from the perspective of lived experience: whether it is understandable and meaningful to survivors, the extent to which it can provide protection and support, what seems feasible and what appears challenging to implement, and what essential needs and mechanisms are missing. At their initiative, a special focus was placed on the extent to which the law recognizes the most vulnerable groups of women, including migrant women, women from marginalized communities, and women who have been multiply discriminated against.

When reading this report, it is essential to bear in mind that the women who participated in the focus groups do not have legal education. Still, they do have a profound experiential understanding of the

system through contacts with the police, social welfare centers, the judiciary, healthcare institutions, and other relevant bodies. It is precisely this experience that makes their contribution invaluable.

Within this process, the NGO Atina team that participated in the working group drafting the Law entrusted the facilitator role to Radmila Dragičević Dičić, a retired judge with extensive experience in protecting victims of human trafficking. Her long professional engagement, deep understanding of the system, and sensitivity to survivors' experiences significantly shaped this process. The presence of Judge Dragičević Dičić helped create a space of trust in which survivors felt respected and safe to share their reflections as equal interlocutors. Her role elicited a robust and positive response from participants, who recognized her authentic commitment, understanding, and respect for their experiences, thereby further strengthening the quality and depth of the discussions. To ensure the conversation was safe and focused, the facilitator was familiar in advance with basic information about the type of exploitation the women survived, the types of support that were available to them, and the judicial proceedings conducted, without any need to reopen these topics during the discussions themselves. The opinions, comments, and recommendations expressed during the focus groups have been summarized in this report to ensure that the legal framework is grounded not only in norms and procedures but also in survivors' lived experiences, dignity, and real needs.

During the Working Group's discussions on drafting the Law, specific issues prompted differing interpretations and debate among its members. In that sense, the views expressed by the focus group participants do not reflect a misunderstanding of legal provisions, but rather their interpretation through the prism of personal experience and prior practice in exercising rights.

Finally, this report is addressed to all who recognize the importance of including survivors' voices in decision-making processes. Their knowledge, formed through direct experience of being beneficiaries of the system, constitutes an irreplaceable contribution to the development of more just, effective, and humane protection policies. We thank everyone who has taken an interest in reading, understanding, and using this report as a basis for further improving the legal and institutional framework.

Methodological framework and approach

This initiative had three interconnected objectives. The first was to empower survivors to directly participate in shaping draft legislation and policies that concern them and are intended to protect them, and to create space for discussion of their future involvement in the law's implementation. The second objective was to collect experiential insights and concrete feedback on the Draft Law to improve the legal framework and practices affecting all victims of human trafficking. The third, fundamental objective was to assess the extent to which the proposed Draft Law can address the needs of all victims, especially those in the most vulnerable positions.

For this report, a strict, formalized methodology was not applied, although a questionnaire had been prepared in advance. Instead of following it fully, the entire process was carefully adapted to the women participating, their needs, their pace, and their ways of understanding legal solutions. The approach was grounded in experiential and evidence-based knowledge, with a clear intention to create a safe space in which participants could speak freely, authentically, and without pressure. This framework enabled insights that go beyond formal analyses and offer a deeper understanding of the proposed legal solution's real reach and limitations.

The analysis focuses on understanding the law from the perspective of survivors' lived experience, on how legal provisions are applied in practice, on the obstacles that exist, and on the needs that remain unaddressed, rather than on a formal legal analysis of the Draft Law.

Focus group participants and experiential context

A total of nine survivors participated in the focus groups; all were formally identified victims of trafficking, with experiences of different forms of exploitation and varying experiences in contact with institutions. Participants were divided into two groups, women from migrant communities and women citizens of the Republic of Serbia, to enable consideration of distinct risks, barriers, and needs associated with legal status, origin, and social context.

The first focus group comprised women who had arrived in Serbia from African and Asian countries. Their experiences include sexual and labor exploitation, as well as multiple forms of abuse during the migration route or in the destination country. For some participants, exploitation occurred while they were minors. Some women survived exploitation in their countries of origin or during transit, while others were exposed to labor exploitation in Serbia.

Their status in relation to institutions and the justice system varied significantly: some participants obtained international protection in the Republic of Serbia, whereas in other cases, exploitation and human rights violations were reported to the competent authorities (inspectors, police, and prosecution), but no judicial proceedings were initiated or concluded. One participant had prior experience with the Advocacy group and with participating in dialogues with decision-makers.

The second focus group included women citizens of the Republic of Serbia who survived sexual exploitation, forced prostitution, forced marriage, as well as combined forms of labor and sexual exploitation, in Serbia and abroad. In some cases, trafficking was detected at an early stage, before exploitation occurred, while in other instances, women endured prolonged exploitation. Judicial outcomes varied: some proceedings resulted in final convictions, while others remain ongoing, including cases in which women must still testify in court. Several participants are members of the Advocacy Group of survivors and have prior experience in dialogue with representatives of the judiciary, independent institutions, and other actors in the protection system.

None of the focus group participants has formal legal education. Still, they possess deep experiential knowledge of how the protection system functions, acquired through direct contact with the police, prosecution offices, courts, social welfare centers, healthcare institutions, civil society organizations, and other institutions. Their insights, based on personal experience navigating the system or its absence, represent a valuable source of information for assessing the real potential of the proposed legal framework.

To protect the participants' safety, privacy, and dignity, all data in this report have been anonymized, and descriptions of experiences are presented in general terms, without personal or other identifying details.

Shared findings from both focus groups

Both groups shared satisfaction at being recognized as relevant participants in this process. They experienced this as validation. They emphasized that, for the first time, they were asked to express their views on a proposed law that concerns the position and rights of victims of human trafficking. Their willingness to respond to questions and suggest ways to realize particular rights was evident; they particularly valued their own lived experiences. Before the focus groups, NGO Atina provided participants with the Draft Law on the suppression of human trafficking and the protection of victims (hereinafter, the Law) for review. Some participants studied the draft Law independently and were highly constructive in discussions. They expressed a desire to become even more thoroughly familiar with the Law, and also readiness to influence its implementation and potential improvement.

In the words of one participant: **“I believe the Law should be implemented as soon as possible and that every person should know what their rights are, to be as informed as possible.”**

Particularly moving was their readiness, after everything they survived, to help others. Some of their statements are reproduced here:

“I think we are fighters, not victims. That’s what I would call it.”

“We are survivors.”

“Those who haven’t survived cannot know. To come out of it strong and smiling, hold your head up and keep going.”

“In the end, you come out much stronger, much more mature.”

“There is no fear more.”

Participants welcomed the state’s intention to draft and adopt this law, but expressed concern about its future implementation. They discussed at length the risks of secondary and repeated victimization in contact with institutions. Their skepticism stems from experiences of institutional failures, primarily within the national referral mechanism, and barriers to exercising rights. Regardless of differences in status and experience, participants in both focus groups identified similar systemic obstacles, primarily concerning information provision, access to healthcare (which, for them, is an existential issue), issues of urgency, and institutional conduct. Their experiences reveal a gap between normative solutions and practice, between “the law on paper” and “life between institutions.”

The Law was assessed as well-conceived, thereby raising expectations for its implementation. Participants emphasized that real implementation will largely depend on financial resources secured by the state, strengthening the capacities of competent institutions, and on establishing effective mechanisms for monitoring implementation. The rights they identified as key include the right to information, healthcare, immediate psychological support, privacy, the protection of personal data, the recovery and reflection period, safety, financial compensation, the victim identification procedure, and the existence and management of the Central Register.

Through discussion, a clear shared position emerged: making formal identification conditional on the survivor’s consent may represent a serious barrier to protection, especially given that many women at that stage do not recognize themselves as victims of trafficking. Participants’ experiences indicate that information is often reduced to fragmented, oral explanations, without written, understandable, and accessible clarification of rights, and without publicly naming an institution or person to whom the victim can turn in case of problems. Women’s experiences indicate that the first contact with the police plays a decisive role in the overall course of protection, and that a negative, discriminatory, or uninformed reaction can permanently undermine trust and deter victims from seeking help. Additionally, when participants refer to “specialized support,” they primarily mean support received through NGO Atina’s programs. Their experiences with the protection system, including institutions and other

actors, were almost always mediated or supported through this type of long-term, comprehensive, continuous, and trauma-informed assistance. This finding matters not as a description of a single organization, but as an indicator that, without specialized expertise, rights guaranteed by law remain difficult to access in practice.

How migrant women understand and experience the law in practice

During the discussions, participants recognized the importance of particular rights through their personal experiences and challenges. Naturally, experiences differed.

Problems were identified in access to healthcare, education, the treatment of children, the provision of insufficient information by competent state authorities, and the inability to exercise rights without obstacles.

One participant, a transgender person, pointed to serious problems in access to healthcare. While travelling towards another country, she suffered a physical attack and severe bodily injuries, along with the loss of personal belongings. The conduct of competent authorities further worsened her situation, as continuity of healthcare and legal protection was not ensured. Due to missing documentation and delayed information regarding rights, access to further treatment was significantly hindered, resulting in prolonged waiting periods for medical interventions. The participant also highlighted barriers to exercising the right to legal aid, including refusals of representation and a lack of sensitization among healthcare and legal professionals to the needs of particularly vulnerable persons.

She stated: **“The right to healthcare must be regulated in a way that allows it to be realized quickly and simply. This is a serious problem for foreigners in Serbia. If we are healthy, we can do anything. Without health, we can do nothing. We don’t have accurate information about our rights. No one tells us what rights we have.”**

Beyond healthcare, this participant and others emphasized the importance of the right to temporary residence. They were unaware of their rights or the procedures for obtaining temporary residence and feared deportation or legal violations.

One participant who was 15 at the time of arrival in Serbia realized only while reading the Draft Law that she had not been treated as a child, that she had not received adequate support from the social welfare center, and that no guardian had been appointed.

Participants reported that their expectations for support in Asylum and Transit camps were significantly higher than what they received in practice, and that the approach could have been far more effective.

This led to the question of the right to information (Article 27). Ultimately, this was marked as the most crucial right for victims because the realization of all other rights depends on it. Victims need to know how to access medical care, what rights are guaranteed in the healthcare system, how to obtain temporary residence status, how to get an education, and related matters.

Two participants also highlighted the problem of racial discrimination. Discrimination based on skin color exists in their everyday life, in the street, on public transport, and when some citizens react inappropriately toward them.

They observed that the Law does not include any specific body within the National Mechanism representatives listed in Article 10 that they could contact directly, without special procedure, for help, information, a particular issue, or a complaint. They have no place to file complaints regarding a lack of assistance, abuse, or other problems.

One participant cited Slovenia as an example, where there is a dedicated office for supporting trafficking victims, which can be contacted directly. They consider this a critical issue, which later developed into a concrete proposal in both groups.

They consider Article 32 (the right to psychological assistance and the protection of physical and mental integrity) as entirely declaratory, without substantive content.

A more extended discussion concerned the identification procedure regulated by Articles 43–53, particularly the requirement of the victim’s consent in Article 47.

There were also questions regarding legal aid for victims during the procedure.

However, discussion of the requirement of written consent for identification revealed the full weight and delicacy of the victim’s position, and, therefore, of the identification procedure itself.

Several participants initially agreed with the Draft Law’s proposal on consent, but during discussion, it became clear that they understood it to enable access to additional rights. Once they understood the essence of consent, they realized it is a complex issue involving the victim’s current psychological state and capacity to face what they endured.

Some participants stated they did not even know they were victims; they had “normalized” what was happening to them, especially those whose exploitation was not sexual, and victims often do not understand what human trafficking can include.

They agreed that indicators for recognizing victims are necessary. One participant put it: **“Now that I talk about the law, I realize I am a victim. Human nature is to deny it.”**

By the end, all participants agreed that requiring victim consent for formal identification may have adverse effects and that it is the state’s responsibility to make the decision independently of the victim’s consent. One victim expressed it as: **“It’s not okay. There’s no need to obtain consent because the state has the right to identify individuals. Some people may say: ‘I’m not a victim.’ But if you hear their story, they are. So there’s no need to ask for consent.”**

Participants also supported the recovery and reflection period (Article 29). They consider it essential, although they have no personal experience with its application.

One participant, seeking to help people, especially those with such experiences, enrolled in a secondary medical school. However, the primary issue is that she can attend only as an external student, as they explained, because she is older than the other children. She is 18 and sees no reason she should not attend school with children aged 14–18. She needs to learn Serbian to follow classes successfully, but regular language learning has not yet been enabled. She asked what exactly Article 40 guarantees, given that it states victims have the right to free education, including the right to integration.

She arrived in Serbia as a child, but now realizes that the special rights guaranteed to children were not fully respected in her case.

They also highlighted the right to financial compensation (Article 41). Any form of compensation means a form of satisfaction: recognition by the state, which can support the process of restoring self-confidence.

They supported the model of a state-funded compensation fund.

They did not view compensation as a one-off payment; instead, they emphasized that the most critical needs are adequate accommodation, food, and clothing, expecting that these could also be provided through various forms of donations.

Some participants currently hold jobs that are very important to them, but these jobs still do not meet all their needs.

They also discussed privacy and data protection in relation to the Central Register. They did not express particular concern about a database per se, but were clear that they do not want their stories shared when unnecessary.

At the end, participants jointly listed the rights they consider most important for implementation.

They again emphasized the right to information as the most important, as the realization of all other rights depends on it.

They also highlighted the importance of free legal aid, temporary residence, the regulation of status in asylum procedures, and the timely issuance of necessary documents to exercise rights to healthcare, education, and employment.

They proposed special activities for training the police on trafficking specifics and victims' rights. They believe there should be specially trained contact persons within the police who can support colleagues working with trafficking victims.

They proposed establishing a special office (or designated contact person) within an institution, possibly within the Ombudsman's Office, accessible to victims without special procedures, staffed by trained professionals who are ready to provide information and assist in exercising their rights, especially in cases of institutional failure.

They expressed a desire to help implement this law and, as their personal contribution, proposed establishing a Council of trafficking survivors to support and empower others. They are ready to undergo training and, if necessary, to participate in training programs for all persons involved under this law in exercising their rights and protecting victims.

Experiential insights from the focus group with women citizens of the Republic of Serbia

Unlike the previous group, where none of the participants took part in court proceedings, all participants in this group have undergone or are undergoing judicial proceedings. Greater familiarity with the Draft Law was observed in the second group than in the first, as was greater awareness of existing problems and potential implementation challenges.

One participant was identified as a victim in Sweden and referred to the NGO Atina, where she received further assistance and support. Another participant is a member of the Advocacy Group and had already identified problems in laws and practice five years earlier, proposing solutions. She believes some of those proposals are reflected in the Draft Law.

She considers it most important that the Protector of Citizens (Ombudsman's Office), i.e., the National Rapporteur on human trafficking, assume oversight of the institutions listed in Article 10. She considers monitoring of institutions' work essential, as well as greater attention to education, necessary for this work to be carried out effectively. She thinks that, mainly because **"today it is often a matter of chance whether a victim's first contact is with a trained professional, particularly in the police and prosecution"**.

Regarding victims' rights, a general remark was that there is no time frame for their realization, except for the urgency principle in Article 8.

Harmful experiences in encounters with competent institutions and during the first questioning were emphasized.

They see the right to psychological assistance and protection as very important, noting that they need both psychologists and psychiatrists, because recovery can take a long time.

One participant stated she was questioned by two inspectors while in the hospital in a severe condition, and they went into detail. She believes she would have felt better if asked by a woman, given the sexual violence she endured.

"A victim is really not capable of describing that kind of violence. Literally, what underwear were you wearing? And I felt insecure. Do they believe me or not? That's why I was dissatisfied. I was dissatisfied when he was released from prison, as I had not been informed. Because he had a restraining order, I mean, on the street, they can approach me. How is that even controlled? How is that controlled? I would like that to be addressed. That should be included in this law."

All of this is important to consider when developing bylaws or professional guidelines.

Safety is crucial for them; therefore, the police must perform their duties effectively and provide protection. They want to be informed about the course of the trial and the moment the accused is released from detention or from serving a prison sentence, and they believe such a provision should have been included in the Law.

In this group as well, the right to information was emphasized as the most important. Their experiences testify to the manner in which information was provided, the insufficient level of information, and the failure to realize this right.

Several participants highlighted negative experiences during court proceedings, inappropriate length of proceedings, and exposure to repeated victimization. One participant emphasized that the court did not sufficiently respect her rights as a particularly vulnerable witness; she was questioned in the same courtroom as the accused and was required to communicate directly with him. She believes the

judge was not sufficiently familiar with the rights of a particularly vulnerable witness and how to apply them in practice.

All victims agreed that they did not have the recovery and reflection period provided for in Article 29. They consider it essential, as well as the possibility of granting vulnerable witness status.

They also have issues with identity protection, because they repeatedly face public disclosure of their names and circumstances. **“The victim’s identity must be protected more smartly.”**

Given the problems they faced, especially repeated victimization, they believe training of police, prosecutors, judges, social workers, and all others in contact with victims is necessary.

They also emphasize the right to work and labor inclusion, as set out in Article 38. They want the state to be more active in supporting their employment. They agree no one at their workplace must know they are victims, because they are often exposed to condemnation, prejudice, and a lack of understanding in their communities.

One victim expressed discomfort with the term “victim” and would prefer the term “injured party.” In discussing compensation (Article 41), they emphasized the importance of this right and their interest in ensuring all victims receive it, regardless of when the Law enters into force.

They proposed that the state secure funds through a dedicated fund, potentially including confiscated assets. The state could pay compensation and then seek reimbursement from the convicted perpetrator.

Regarding identification provisions, they expressed confusion about the status of a formally identified victim and questioned why that is needed. They do not understand whether it means receiving a certificate linked to the exercise of rights under the Law.

As with the group of foreign nationals, there was extensive discussion regarding the victim’s consent to formal identification.

The prevailing view was that consent should not be required, primarily due to the victim’s specific position and capacity to recognize they are a victim. **“Some victims need to deny it”.**

They linked formal identification and consent to the recovery and reflection period, stating that victims often need much more time to understand their situation and what they survived. Most said they realized they were victims only after a longer time and recovery at NGO Atina.

One participant described it: **“What someone experiences, I think no one can forget. There needs to be a much longer recovery than we think. Much longer. And then you simply can’t, you don’t trust people much, you can’t talk to everyone, you lose trust.”**

Ultimately, they unanimously concluded that the victim’s consent to formal identification is not necessary.

They concluded that the identification procedure is quite complex and includes the possibility of complaints and appeals against the Center’s decisions. Therefore, it should be mandatory that victims have free legal aid at this stage, and where necessary, a psychological assessment, primarily to assess the victim’s actual capacity to decide about consent. Identification should be conducted using objective indicators and a risk assessment.

Some responses included:

“Well, it’s a double-edged sword. On one side, it’s like giving the victim a bit of control back over her life; she decides yes or no. Someone asks for her opinion and consent; no one decides on her behalf. On the other side, someone doesn’t recognize herself as a victim. So...”

“You have victims who constantly deny they are victims. I don’t deny it. I have nothing to be ashamed of. That can happen to anyone. God forbid it happens to someone.”

A substantial portion of the discussion focused on the Central Register and on data processing related to trafficking victims.

Participants expressed distrust and disagreement with Articles 58 and 59, primarily because they do not see explicit guarantees of data protection and fear that too many institutions could access the register without clearly defined reasons. They were particularly concerned about undefined medical data and personal document data. They believe the Law does not guarantee privacy or prevent the misuse of their data.

They propose requiring their consent for part of the register, limiting the number and type of data entered, and restricting access only to the police, the Center for the Protection of Trafficking Victims, and the competent prosecution.

Discussion of forms of exploitation, especially begging, also raised the issue of insufficient inclusion of the Roma community's experiences. They highlighted forced marriages and begging, especially involving children, as the most sensitive. They believe the Roma community is insufficiently protected and that special education and preventive media campaigns are needed.

This group also proposed appointing a person within the Ombudsman's Office / National Rapporteur for direct contact with victims and rapid response, available without special procedure to answer questions and receive complaints about institutions.

They expressed readiness to participate in the implementation of the Law. They can contribute most by empowering newly identified victims. They proposed establishing a Council of persons with lived experience of trafficking.

They are willing to participate in education programs in schools because they believe it is not discussed enough, and children need to know what exploitation is and how anyone can become a victim.

They observed that the Law lacks provisions specifically addressing prevention measures and propose adding such provisions.

They propose strengthening the Center for the Protection of Trafficking Victims, including hiring enough professionals, particularly psychologists and psychiatrists, and ensuring state-funded trauma-informed care. They propose recognizing post-traumatic stress as a consequence of trafficking trauma in most cases and conducting research on how trauma affects victims' lives.

They also propose a dedicated 24/7 call center for trafficking victims, where victims could call at any time for anything they need.

Key conclusions and recommendations by the participants

- The main conclusion is that victims expressed interest in the Law and were ready to help implement it.
- We believe these discussions demonstrated an unquestionable contribution by participants in interpreting and understanding the Law from the victim's perspective and lived experience. The most prominent systemic weaknesses were highlighted, guaranteed by domestic laws and international standards.
- Participants from both groups showed particular interest in the right to information, privacy, and personal data protection; the recovery and reflection period; safety; financial compensation; the victim identification procedure; and the existence and management of the Central Register of trafficking victims.
- We highlight the most important conclusions and recommendations emerging from the discussions:
- The Law is well-designed, creating high expectations for its implementation.
- Implementation depends primarily on the resources the state allocates and the genuine political will to strengthen competent institutions and establish effective oversight of the Law's implementation. This includes the obligation to set standards and ensure stable funding for specialized services with proven results and victims' trust, so that the law becomes workable in everyday life, not only normatively correct.
- They expect that implementation will improve the situation of current and future trafficking victims.
- They are ready to help implement the Law, primarily through participation in empowerment programs and various trainings.
- They believe certain rights are stated only declaratively and should be elaborated further. As examples, they emphasized Articles 6 (Principle of non-discrimination), 8 (Principle of urgency), and 32 (Right to psychological assistance and protection of physical and mental integrity).
- They identified the right to information (Article 27) as the most essential right. Proper and practical realization of this right across all relevant institutions determines the realization of all other essential rights. Victims must be thoroughly and adequately informed. They agreed that they did not receive timely, complete information about their rights from the police or the prosecution. They encountered misunderstanding, unkindness, lack of knowledge, and unwillingness to examine whether they may be trafficking victims, which exposed them to repeated victimization. Information was often provided in a fragmented, one-off manner, without verifying its genuine understanding.
- They propose mandatory training for police and prosecutors on human trafficking and victims' rights.
- They propose that police departments and foreign departments have specially trained staff as contact points for victims and colleagues who encounter potential trafficking victims.

- They supported the recovery and reflection period (Article 29) as essential, although they had never experienced it being explicitly explained or applied; they also considered it necessary within the identification process.
- They consider the right to compensation necessary and experience it as a form of personal satisfaction.
- They propose that the state assume responsibility for compensating victims in criminal proceedings and subsequently seek reimbursement from the convicted person, as this approach is more straightforward for the state and would help victims avoid renewed victimization.
- They propose establishing a State Fund for trafficking victims, from which compensation and various forms of assistance would be paid. The fund could be financed in part from assets seized as unlawful proceeds and from assets confiscated under the Law on Confiscation of the Proceeds of Crime.
- They emphasize the importance of the right to healthcare and education.
- They propose that health and education laws include explicit provisions for trafficking victims, especially children and young adults, including enabling participation in education programs directly in schools.
- They propose establishing a dedicated service (a designated person) within the Ombudsman's Office, responsible for providing immediate assistance (information and the urgent handling of complaints) in exercising rights, available daily and able to respond promptly.
- They recognize the importance of the Center for the Protection of Trafficking Victims but propose strengthening its capacities, especially by employing psychologists and psychiatrists.
- Regarding identification, they propose removing the provisions in Articles 46 and 47 requiring victim consent for formal identification. The main reason is that some victims deny their exploitation due to psychological state, guilt, perceived consent, and inability to understand the consequences of consent. They also proposed relativizing consent by introducing mandatory expert assessment when the victim refuses formal identification or refuses assistance/protection/support (as in Article 45(6)). It should be noted that, under international conventions, certain forms of support and protection cannot be conditioned on the victim's consent.
- They propose that during identification, the Law guarantees free legal aid and psychological support, because victims may file objections to formal identification decisions and extraordinary review requests regarding preliminary identification (Articles 49–52).
- They propose revisiting Articles 58 and 59 on the Central Register, because victims fear privacy violations and data misuse. They believe the amount of data is excessive and that medical data are insufficiently defined; Article 11(2) should specify which medical data may be exchanged.
- Some proposed requiring victim consent for part of the register.
- The Central Register is perceived as a risk rather than a protection. They propose restricting data exchange to the Center, police, and prosecution. The availability of data to other bodies under Article 59(4) is too broadly defined, especially with respect to “public interest.”

- They propose including a provision to ensure that victims are informed of the release of accused persons from detention or prison. This could be included under Article 32 (protection of physical integrity during and after criminal proceedings). It could also be regulated by amending Article 50 of the Criminal Procedure Code (CPC) to impose an obligation to inform the victim, and by amending Article 181 of the Law on the Execution of Criminal Sanctions to extend notification of release to trafficking victims.
- They propose adding specific provisions on protecting the Roma population as a particularly vulnerable group, focusing on prevention and effective investigation of exploitation through begging and forced marriages, especially when children are involved.
- They propose establishing, with state support, a Council of persons with lived trafficking experience, where empowered survivors could support other victims; such a model could also function within representative associations.
- They expressed readiness to participate in trainings for police, prosecutors, judges, and schoolchildren, as well as in designing media campaigns and prevention actions against trafficking.
- They believe the Law mentions prevention but does not define activities. They propose adding provisions that obligate the state to implement prevention through media campaigns, public awareness, and targeted work with children in schools and vulnerable groups.
- Finally, participants' experiences indicate that the rights and support they accessed were available primarily through their inclusion in specialized civil society organizations' programs. Most participants initially assumed the support they received was standard for all victims. Still, through the discussions, it became clear that without such support, their recovery would have been far more difficult and uncertain. This points to the need for systemic recognition and strengthening of specialized services with experience working with trafficking victims. Given the importance of such associations, they propose that the state, under this Law, clearly commit to institutional support and the necessary cooperation with associations that have demonstrated results, professional capacity, and victims' trust.