



United Action Against Human Trafficking
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JOINT ASSESSMENT REPORT

TOWARDS A UNIFIED RESPONSE: MAPPING AND STRENGTHENING ANTI-TRAFFICKING MECHANISMS IN CYPRUS



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**UNITED ACTION
AGAINST HUMAN
TRAFFICKING**



Caritas
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CONTENTS

| | |
|--|----|
| Executive Summary | 4 |
| Introduction | 5 |
| Objectives of the Study | 5 |
| Responding to Trafficking in Human Beings: Why a Bi-Communal Approach is Necessary | 6 |
| Legal and Policy Frameworks/Context | 7 |
| EU Policy Context | 7 |
| Legal and Institutional Framework in the RoC | 7 |
| Legal Framework in the northern part of Cyprus | 10 |
| Gaps and Shared Shortcomings | 12 |
| Key Findings: Assessment by “3P” Pillars | 16 |
| Prevention | 18 |
| Protection | 20 |
| Prosecution | 24 |
| Recommendations | 24 |
| Short-Term Recommendations (0-12 Months) | 25 |
| Mid-Term Recommendations (1-3 Years) | 25 |
| Long-Term Recommendations (3-5 Years) | 26 |
| In-Depth/Cross-Cutting Recommendations | 26 |
| Protection | 27 |
| Prosecution | 28 |
| Prevention | 28 |
| Conclusion | 30 |
| References | 31 |
| Annexes | 32 |



EXECUTIVE SUMMARY

This report critically assesses the anti-trafficking mechanisms in place on the island of Cyprus with a focus on the "3P" framework: Prevention, Protection, and Prosecution. It draws from desk research and six semi-structured interviews with key stakeholders involved in current anti-trafficking practices, policies, and frameworks. These insights in particular were important in shedding light on what improvements are needed to make the anti-trafficking ecosystem more effective. The study is funded by the European Union – 2023/442-778 United Action against Human Trafficking Project.

The report highlights critical gaps and good practices while aiming to provide actionable recommendations from a multi-communal perspective. While the Republic of Cyprus (RoC) has a well-developed legislative framework and national mechanisms, significant implementation challenges exist. In contrast, the northern part of Cyprus has only recently criminalised human trafficking and lacks fundamental structures for victim protection and case prosecution. Both face institutional inertia and could do more to put the victim at the centre of care and integration. The unique political situation and the unresolved conflict on the island continue to hamper the cooperation that would better prevent trafficking and protect its victims.

Key recommendations emerging from this assessment include the need to:

- Establish some anti-trafficking coordinating body in the northern part of Cyprus to recognize that the issue exists and merits addressing;
- Adopt a comprehensive anti-trafficking framework in the northern part of Cyprus that defines trafficking crimes, ensures victim protection, and mandates institutional responsibilities across sectors;
- Strengthen the implementation of the National Referral Mechanism (NRM) in RoC;
- Create sustainable bi-communal platforms for knowledge exchange and networks that would improve anti-trafficking efforts;
- Enhance victim-centred and gender-sensitive support and integration services in both communities and across the board.



SUMMARY OF FINDINGS

| Feature / Indicator | Republic of Cyprus (RoC) | northern part of Cyprus |
|--|--|--|
| Legal Framework | Law 60(I)/2014 | Article 254 (2020); no comprehensive law |
| National Action Plan (NAP) | 2023–2026 NAP in place | No ‘NAP’ |
| Anti-Trafficking Police Unit | Dedicated unit with trained staff | None |
| Shelter availability | State shelter (closed), Sofi’s House (open) | One ‘municipal’ DV shelter, no THB-specific shelter |
| National Referral Mechanism (NRM) | Formal NRM since 2016; gaps in implementation | No formal mechanism; NGOs attempt ad hoc screening |
| Judicial outcomes | Low conviction rate, some cooperation with Europol | One conviction; no specialised prosecution unit |
| Civil Society Role | Consulted via the MCG; underfunded; bears burden | Leading role: bears burden without ‘state’ support |
| Training on THB | Police and NGO-led trainings; uneven coverage | Civil society-led trainings; lack of institutionalisation |
| Prevention campaigns | Limited awareness raising; EUAA training | None; reactive control at the entrance of the northern part of Cyprus framed as prevention |

INTRODUCTION

Objectives of the Study

The purpose of this study is to map existing anti-trafficking mechanisms in Cyprus and efforts to improve anti-trafficking practices island wide. Adopting the “3P” paradigm—Prosecution, Prevention, and Protection—it aims to analyse current practices and frameworks in both communities and to explore ways to improve them as well as to bridge the differences that may hamper efforts to better combat human trafficking and/or care for its victims. The study emphasises best practices where they exist.

This report is based on desk research and six in-depth stakeholder interviews: three in the northern part of Cyprus and three in the RoC. These insights are important in understanding what improvements are needed to make the anti-trafficking system more effective. The political division of the island presents access limitations on multiple levels and the unique legal status of the northern part of Cyprus poses challenges for international cooperation and formal reporting. Together, these make efforts to improve coordination in anti-trafficking particularly difficult. It is important to note that this report tries in earnest to reflect on the situation as it is, as it could be and as it should be using widely accepted terminology. It strives to impart meaning and focus readers on substance not to inadvertently offend.

Responding to Trafficking in Human Beings: Why a Bi-Communal Approach Is Necessary

Trafficking in Human Beings (THB) remains a grave issue across Cyprus. While the RoC has ratified key international instruments and built national mechanisms, implementation is uneven. The northern part of Cyprus, facing structural and legal challenges, relies largely on civil society initiatives. A bi-communal perspective is essential to address intra-island trafficking flows and to build an informed and harmonised response.

Human trafficking, as defined by the Palermo Protocol, includes the recruitment, transportation, transfer, harbouring, or receipt of persons through coercion, deception, abuse of power, or exploitation. It covers practices such as forced labour, sexual exploitation, slavery, and organ removal.

Despite international standards and criticisms, trafficking in the northern part of Cyprus persists as a systemic human rights violation. The northern part of Cyprus is a destination point for victims of trafficking for the purposes of both sexual and labour exploitation. It is also widely reported that potential ‘university’ students are sometimes targeted by traffickers who falsely promise high level education placements. Primary targets are unsuspecting students from Africa. Political non-recognition and a unique legal structure have created substantial obstacles to victim protection, perpetrator accountability, and the implementation of preventive measures.

Both the RoC and the northern part of Cyprus were criticised in the early 2000s for exploitative ‘visa’ and employment practices. While the RoC ratified the Council of Europe Convention on Action against Trafficking in Human Beings in 2008, only minimal steps have been taken in the northern part of Cyprus. A March 2020 amendment to the ‘criminal code’ introduced a provision criminalising human trafficking in the northern part of Cyprus. However, this has led to only a single conviction (in December 2022), and deportation remains the default response to victims—contravening even the limited protections within the new legal text.

Although the unique political situation has so far prevented a bi-communal approach to anti-trafficking in Cyprus, there is some exchange and cooperation at the civil society level. Despite the political and geographical division, traffickers and victims move between the two communities, often exploiting the ‘Green Line’ (the UN-controlled buffer zone) as a loophole. This highlights a need for information sharing, joint operations, and coordination with the aim of closing any gaps and preventing traffickers from exploiting the unique situation and the lack of formal collaboration. Precisely because it is difficult at the leadership level due to recognition issues, it is of utmost importance to have cooperation at the level of experts and civil society. Additionally, trafficking in human beings is an issue that transcends borders, conflicts and politics. A bi-communal response can foster cooperation between Greek Cypriot and Turkish Cypriot local bodies and civil society, building trust in a divided society. It can serve as a confidence-building measure in broader peace efforts. Most importantly, a bi-communal approach would repair some of the fragmentation that limits the effectiveness of anti-trafficking efforts with repercussions for victims.

LEGAL AND POLICY FRAMEWORKS / CONTEXT

EU Policy Context

Trafficking in Human Beings (THB) is a major problem in the EU and is only getting worse. In 2024, an increase in trafficking of 6.9% has been reported, with the number of identified victims reaching 10,793. The exact number for male victims is not provided in the Eurostat report (2025). When it comes to traffickers, the proportion of women is much lower than that of men. Human trafficking is a multi-layered issue, as it includes both a gender-dimension and a close interconnection with migration flows. Female victims represent 63% (nearly two-thirds) of all victims (Eurostat, 2025). Specifically, trafficking of women and girls for the purposes of sexual exploitation remains the most widespread form of exploitation in 2023, reaching nearly 44%, though forced labour has been growing to an almost equal proportion, reaching 35% (Eurostat, 2025).

The statistics mandate particular attention to trafficking of women on the one hand, and trafficking for the purposes of sexual exploitation on the other. THB is a form of violence against women, a highly gendered crime, evidenced not only from the statistics, but also from the severe, long-term consequences and harm it has proven to cause its victims. Victims' recovery requires significant specialised intervention investment over long periods. Therefore, planning and organising efficient recovery and re-integration programmes is of paramount importance (Kaili, 2021). Moreover, THB has been entangled with significant migration flows into and within the EU. Organised criminal groups involved in THB often exploit existing migratory routes to traffic victims into and within the EU, exposing the nexus between asylum seekers and human trafficking. However, trafficking of women for sexual exploitation remains a low priority across several member states and many women victims of THB are not formally identified as such. Despite insufficient identification efforts, including in the asylum process, a sizeable proportion of the sex trafficking victims registered in the EU are third country national women. This introduces sensitive factors such as immigration status, cultural specificity, limited eligibility to general state-funded services, lack of support networks, and increasing racism and xenophobia as considerations. This makes integration assistance particularly challenging, as it requires gender-specificity, expertise in violence against women (VaW), as well as an intersectional competence all at once (Kaili, 2021).

Legal and Institutional Framework in the RoC

The Republic of Cyprus (RoC) remains a destination country for victims of THB. According to the Council of Europe's Group of Experts on Action against Trafficking in Human Beings (GRETA), conviction rates for smugglers who exploit women for sex, forced marriage, and labour remain low. Some trends can be noted, such as a very low rate of identification for victims of THB and the abuse of visa regimes (tourist visas and working visas) by transnational criminal networks to bring victims into the country and exploit them. It is stated that there has also been an increase in the number of asylum-seekers being exploited at some point along their migration journey by smugglers and traffickers. Finally, there is an increase of trafficking for the purpose of forced marriage, mainly by European criminal groups that exploit women, often from Bulgaria and Romania (GRETA, 2025).

Considering that the RoC has seen a huge increase in the number of first-time asylum applicants in the last decade, this entanglement between victims of trafficking and asylum-seekers adds a layer of complexity to the issue of identification of the victims of THB. According to the AIDA report (2024), even though efforts are made to prioritise cases concerning vulnerable persons such as victims of torture, violence, or trafficking, this is not always possible due to the high number of cases pending. Moreover, other significant safeguards are not always followed. These include vulnerability assessments and assessments of the psychological condition and how this may affect their capacity to respond to interview questions. Specifically:

“These cases may start out as prioritised but there are often delays due to the heavy workload of examiners handling vulnerable cases, the lack of interpreters, or requirements for other examinations to be concluded before a decision can be made, such as examinations of victims of torture by the Medical Board or of victims of trafficking by the Anti-Trafficking Department of the Police.” (AIDA, 2024: 38)

Potential victims of THB typically enter Cyprus either by sea or by crossing the UN-administered buffer zone that separates the island. The southern part of the island is governed by the internationally recognized Republic of Cyprus (RoC). The northern part of the island has been under the de facto control of the Turkish Cypriots since 1974 and declared itself the ‘Turkish Republic of Northern Cyprus (TRNC)’ in 1983—a ‘state’ recognized only by Turkey. The UN Buffer Zone that separates the two communities, also known as the ‘Green Line’, is patrolled by the United Nations Peacekeeping Force in Cyprus (UNFICYP) and serves as both a physical and political divide. The movement of migrants across this divide presents unique legal and humanitarian challenges because two out of three migrants who apply for asylum in the RoC arrive by irregularly crossing the UN-administered buffer zone. Smugglers offer their services to potential asylum seekers without explaining the intricacies of the political situation on the island. This leaves migrants and asylum seekers, especially women, at risk of trafficking, sexual exploitation, and re-traumatisation (Kaili, 2021). Many of the presumed victims were identified among asylum seekers who were exploited in the northern part of the island (Republic of Cyprus, 2023). According to the GRETA report (2025), there has been a significant increase in the number of asylum seekers identified as presumed victims of THB or at risk of being trafficked, in particular girls and young women from Syria and women and men coming from African countries (mainly Cameroon and Nigeria).

The RoC’s legislative framework for tackling human trafficking and exploitation is harmonised with EU Directive 2011/36/EU and Council Directive 2004/81/EC. The 2014 Prevention and Combating of Trafficking and Exploitation of Persons and of the Protection of Victims Law (L.60(I)/2014) is the most recent revision to the relevant legal framework. It aims to prevent, suppress, and combat THB, protect and support victims, and promote international cooperation. The law provides for non-discriminatory protection and access to compensation, with special provisions for child victims. It includes penalties for various forms of exploitation, document confiscation, and bribery.

The RoC also implements the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention) and the Council of Europe Convention on Action against Trafficking in Human Beings.

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The RoC also implements the Council of Europe Convention on Action against Trafficking in Human Beings.

Complementary legislation includes:

- **Guaranteed Minimum Income Law (109(I)/2014):** Ensures a minimum dignified standard of living, including for THB victims.
- **Protection of Witnesses Law (95(I)/2001):** Aims at the protection and assistance of endangered witnesses.
- **Legal Aid Law (165(I)/2002):** Provides legal advice and representation to those who cannot afford it, including THB victims.

Institutionally, the Multidisciplinary Coordinating Group against Human Trafficking (MCG) was established in 2007 under section 64 of Law 60(I)/2014. It monitors implementation of anti-trafficking measures and coordinates state and NGO actions. In 2024, its coordination was transferred to the Deputy Ministry of Migration and International Protection where it has been languishing.

The National Referral Mechanism (NRM), developed by the MCG in 2016, defines cooperation frameworks for the identification and protection of THB victims. It ensures that presumed victims receive consistent and timely support and maps the role of each actor involved. The Social Welfare Services (SWS) are responsible for referrals to the police, which in turn carry out formal identification and inform victims of their rights.



The National Action Plan (NAP) 2023–2026 follows the 4P framework (Prevention, Prosecution, Protection, Partnerships). Although positively evaluated by GRETA, it lacks a dedicated budget and independent evaluation mechanisms.

Despite these laws and processes, several issues persist:

- Delays in victim identification and lack of coordinated multi-agency action.
- Weak implementation of the NRM and poor psychological support services.
- Understaffing of SWS and language barriers in communication with victims.
- MCG meetings are irregular, with limited transparency and NGO representation.

To address these issues, GRETA has recommended establishing a National Rapporteur with an independent monitoring mandate. This would require legislative amendments to empower the Office of the Commissioner for Administration and Protection of Human Rights with appropriate resources.

Legal Framework in the northern part of Cyprus

There is no comprehensive anti-trafficking ‘legislation’, Action Plan, or Referral Mechanism in the northern part of Cyprus. The legal instruments relevant to trafficking are:

- ‘Criminal Code (Fasil 154, Article 254)’
- ‘Work Permits for Foreigners Legislation (63/2006)’
- ‘Legislation on Night Clubs and Such Entertainment Places (7/2000)’

THB was only defined as a crime in 2020 with the addition of ‘Article 254 to the Criminal Code’. The ‘article’ criminalises forced labour and trafficking, providing penalties of up to 16 years imprisonment. However, its practical implementation is severely limited. Victims receive no legal or social protection, and ‘police’ often deport them due to expired ‘visas’, despite the ‘article’s’ explicit protections.

The absence of shelters, legal aid, and victim services further compounds the issue. NGOs, with limited funding and capacity, remain the only support systems available. As a result, victims often choose not to report abuse, fearing deportation and further harm and recognizing that effectively there is no support available.

According to **‘Article 254 of the ‘Criminal Code’**, *‘Any person who forces any person to work illegally against their will is guilty of a misdemeanour and may be sentenced to imprisonment for up to one year.’*

‘254 B. (1) Any person who enables a person to enter the country or go abroad by using threats, pressure, force or violence, by abusing influence, by deceiving or by taking advantage of the control over people or by abusing the vulnerability of people, in order to force them into labour or prostitution or to serve, or to subject them to servitude or slavery, or to obtain the donation of body organs, or kidnaps them, or takes them from one place to another, or transports them, or shelters them, is guilty of a serious crime called Human Trafficking and, if convicted, may be sentenced to imprisonment for up to 10 (ten) years, or to a fine, or to both.’

‘(2) If there are acts that are committed for the purposes specified in the first paragraph and constitute a crime, the consent of the victim is not taken into account.’

‘(5) (A) In cases where the investigation or prosecution of the crime of human trafficking is ongoing, no criminal prosecution shall be initiated and no administrative fine shall be imposed on persons who are reasonably suspected by the ‘police’ and/or the court to be victims of this crime, in respect of acts constituting an offence under the Aliens and Immigration Law which they were forced to commit as a direct result of the crime of human trafficking.’

‘(B) In the case of persons who are reasonably suspected by the ‘police’ and/or the Court to be victims of the crime of Human Trafficking during the ongoing investigation or prosecution under the Aliens and Immigration Law, the investigation or prosecution shall be suspended until it is determined by a Court decision whether the person is a victim of the crime of Human Trafficking.’

As the above article demonstrates, there is an explicit “right” given to victims for delayed prosecution while the “investigation or prosecution of the crime of human trafficking is ongoing”. Nevertheless, the interviews carried out with experts reveal that in all the suspected THB cases, victims have been deported by due to expired visas. This is against ‘Article 254 (B) subsections 5 (A) and (B)’, meaning the only protection provided is not actually implemented.

Nonetheless, even if victims are not deported, the lack of protection or shelter services available to them publicly would leave them on their own, bringing with it the risk of re-victimisation or retribution during the lengthy legal proceedings. In such instances, NGOs, which themselves only have limited finances, are the only source of support for victims.

Since possible victims have no rights by ‘law’, they simply decide not to go to the responsible ‘authorities’, which means many trafficking cases go unidentified. The lack of comprehensive anti-trafficking ‘legislation’ poses a legal barrier that prevents victims from receiving full protection, justice, and residence permits.

‘Article 254’ also does not allow for the training of ‘police’ officers on THB, nor does it establish a dedicated anti-trafficking service or unit. Interviews show that establishing a separate ‘police’ unit with expertise on a specific issue could result in significant progress. According to experts, this was the case with the Violence Against Women Unit (VAWU), where members of the dedicated unit were trained on violence against women and have successfully prosecuted cases. Civil society was instrumental in both lobbying for and training the VAWU. At the time, the Nicosia ‘municipality’ Shelter for Domestic Violence Victims mobilised civil society and established a network of organisations working on the issue, which then became the main driver. The Nicosia ‘municipality’ Shelter for Domestic Violence Victims still works closely with the relevant local bodies on violence against women cases. Nevertheless, “successes” meant that “politically connected” individuals were also investigated and prosecuted, which in turn led to political backlash. As a result, staff were transferred to other units and new members who were not as “enthusiastic” (i.e., less likely to scrutinize those with connections to power) were appointed, illustrating the importance of insulating progress and the significance of political will in sustaining reforms.

Hence, we can say that the VAWU under the ‘police’ is both a good and a bad example for any future anti-trafficking capacity. The good practices of the VAWU could be used as a starting point. There is will and determination at the civil society level to pursue a similar action plan in lobbying for an Anti-Trafficking ‘police unit’. Experts interviewed stated that there does not need to be new ‘legislation’ for this to happen. A bill must be issued within the ‘police’ for a new section, and as long as there is political will, this is fairly simple to do. What will need to follow is a level of independence that will allow the dedicated capacity to do pursue its mission.

‘WORK PERMITS FOR FOREIGNERS LEGISLATION: (63/2006)’

‘Article 10 (2) A foreign worker working in a workplace with a work permit cannot work in a workplace other than the workplace specified in the work permit or with another employer and cannot be transferred to another employer by his/her employer.’

‘Article 10(2) of the ‘Work Permits for Foreigners Law’ prohibits workers from changing employers. This inflexibility increases vulnerability and traps workers in exploitative conditions, creating an environment conducive to trafficking. Currently, there is no debate about changing this ‘legislation’ to make work environments less conducive to trafficking.’

‘LEGISLATION ON NIGHT CLUBS AND SUCH ENTERTAINMENT PLACES (7/2000)’:

Finally, the ‘Legislation on Night Clubs and Such Entertainment Places (7/2000)’ permits the ‘police’ to confiscate the passports of women employed in night clubs—an act that constitutes a violation of international human rights law. While ‘Article 157 of the ‘Criminal Code’ criminalises the act of “encouraging” prostitution; ‘Article 156 prohibits prostitution in night clubs; ‘Article 159 prohibits anyone being forcing into prostitution; ‘Article 162 prohibits detaining women against their will for the purposes of prostitution; ‘Article 165 prohibits pimping; and ‘Article 160 prohibits landlords from allowing prostitution on their premises’, it is an open secret that prostitution occurs within night clubs. The night club ‘legislation’ effectively enables this by mandating regular medical checks for sexually transmitted diseases specifically for women employed in such venues, thereby institutionalising their exploitation under the guise of public health regulation. Forced labour and debt bondage are regular practices in night clubs, which also go unrecognised and unpunished.’

Gaps and Shared Shortcomings

Despite positive legal and policy measures put in place to tackle THB in the RoC, some shortcomings remain for full implementation of the legal and policy provisions stipulated in the law. These areas include victim identification, integration (especially gender-specific integration), and effective use of the NRM by governmental and non-governmental services in order to ensure better access of victims to services and justice. Furthermore, the Cyprus Refugee Council (CyRC) frequently identifies cases where issues such as gender-based violence, torture, human trafficking, exploitation, and trauma are not detected or not considered, or if they are considered, there is often a divergence as to how they are assessed (AIDA, 2024: 35). One issue in the RoC is that women and men are not equally integrated and protected under asylum processes. When it comes to integration policies, gender-specific needs of the asylum population have not been adequately addressed. There are likely many reasons for this, including the lack of women’s participation in local and national politics. Indicatively, Cyprus currently ranks 21st in the EU on the Gender Equality Index (56.9/100 points – 11 points lower than the EU average). Gender inequality is significant especially in the domain of power, where it is at the bottom of the rankings among member states (European Institute for Gender

Equality, 2025). The low Women-Friendliness in Asylum Index (WFA) score, which explores the implementation of women's rights in the framework of asylum recognition and reception, reflects the weaknesses of gender equality and migration policies in Cyprus (Emmenegger & Stigwall, 2019).

It has been noted by front-line NGOs that the SWS have failed to assess and respond to the needs of victims of THB in a timely or adequate manner. The main factors are the long delays in each phase of the process of assessing the needs of the victims, the lack of a gender-specific and culturally appropriate approach, and the understaffing of the responsible authorities. The victims of THB suffer from the uncertainty of their situation and face a long wait to be granted victim status and a residency permit. A lack of communication between victims of THB and the authorities, including the SWS, reinforces the anxiety of the victims (GRETA, 2025). Most of them are not provided with any information in a language they can understand and remain uncertain and anxious for years, compounding their trauma. When the police are interviewing them, their lack of training can result in a re-traumatisation of the victims. Victims' fear of talking to officials creates an unfavourable environment for the prosecution of the criminals. Because of this, criminal proceedings turn out to be very lengthy and tiring for victims of THB, and the conviction rate remains very low (Kaili, 2021).

To even arrive at the possibility of conviction, however, victims first need to be identified through the National Referral Mechanism (NRM). The NRM is, in theory, well thought-out, and there is co-ordination between the SWS and the police, who understand and acknowledge their respective roles. Nevertheless, the experiences of women victims of THB revealed that this coordination is not sufficiently implemented in practice. As a result, presumed victims are less likely to be identified and assisted in a timely or adequate manner and recognised victims continue to face difficulties (Kaili, 2021).

In the 2025 GRETA report, the RoC's National Action Plan was assessed positively, but it was noted that no separate budget is allocated for its implementation, and no independent evaluation of these documents is envisaged. The report stresses the importance of ensuring that sufficient funding is secured for the implementation of all objectives and actions in the National Action Plan. At the same time, it is emphasised that it is necessary to conduct an independent evaluation of the implementation of the Strategy and the Action Plan as a tool for assessing the impact of the activities and for planning future policies and measures to combat human trafficking (GRETA, 2025). The GRETA report (2025) also stressed the importance of an external evaluator, equivalent to a National Rapporteur, whose tasks include studying trafficking trends, evaluating the results of action taken in the RoC to combat THB, and gathering statistical data in co-operation with relevant institutions and NGOs. However, an amendment to Law 60(I)/2014 required to enable the effective performance of this role has not yet been adopted. GRETA invites the Greek-Cypriot authorities to adopt legislative amendments necessary to enable the Office of the Commissioner for Administration and Protection of Human Rights to assume the role of National Rapporteur, and to ensure that it has sufficient resources to be able to monitor the anti-trafficking activities of state institutions and make recommendations, in line with Article 29, paragraph 4, of the Convention (GRETA, 2025).

It has also been noted that, if the MCG meets three times a year, there have been no reports or transparency about it. Only four NGOs participated in the work of the MCG (Cyprus Stop Trafficking, SPAVO, Caritas Cyprus, and Wellspring). Some NGOs have observed that the application process for joining the MCG is rather onerous, requiring organisations to submit a lot of documentation and participate voluntarily (GRETA, 2025).

Though the RoC's referral and enforcement mechanisms face significant shortcomings, the northern part of Cyprus has no referral mechanism or separate and dedicated anti-trafficking capacity within law enforcement, as mentioned above. This results in several significant challenges, including:

The lack of a dedicated unit or a referral mechanism leads to limited victim identification and protection. Due to having no specialised mechanism for proactively identifying and supporting human trafficking victims, many remain undetected or are treated as offender (for immigration violations), leading to inadequate protection and support services. Law enforcement lacks the needed specific training which results with weak law enforcement response. Training is needed for the units to investigate trafficking cases effectively. Lack of strengthening of the law enforcement can and does lead to insufficient investigations, poor evidence collection, and low conviction rates of traffickers (only one since 2020).

Due to inadequate data collection and lack of effective monitoring, cases are left unassessed. A dedicated and trained anti-trafficking unit typically tracks and analyses trafficking trends, helping develop informed policy responses. In its absence, reliable data is scarce if not non-existent, making it difficult to assess the scale of the problem or allocate resources effectively. The absence of a specialised body hinders coordination of efforts across different sectors such as law enforcement, immigration, social services, and between the authorities, and NGOs. Information sharing and coordination plays a key role in combatting human trafficking.

A dedicated anti-trafficking capacity can and does often lead public awareness campaigns and community outreach. Without such, a nucleus' prevention efforts may be sporadic or absent, and the public may remain unaware of how to recognise or report trafficking. Low public awareness can lead to unawareness and limited reaction for potential preventions.

Similarly, there is no specialised shelter for victims of trafficking in the northern part of Cyprus, which has serious implications for victim protection, recovery, and the overall effectiveness of anti-trafficking efforts. Relating to above mentioned gaps and challenges, key consequences develop including:



INADEQUATE SAFETY AND PROTECTION

Victims of trafficking—especially those escaping exploitative or violent environments—require a secure and confidential place to stay. Without a specialised shelter, victims are placed in the domestic violence shelter run by the Nicosia 'municipality', which has limited places available. Otherwise, they are placed in hotels or unsafe environments, leaving them vulnerable to re-trafficking, intimidation, or further abuse.



LACK OF SPECIALISED SUPPORT SERVICES

Specialised shelters offer trauma-informed care, medical and psychological support, legal assistance, and case management tailored to the needs of trafficking survivors. In the absence of such shelters, victims may not receive the comprehensive care they need to recover and reintegrate. At the moment, the only available services are organised by civil society, mostly on a voluntary basis.



BARRIERS TO COOPERATION

Victims who do not feel safe or supported are less likely to cooperate with investigations or 'legal' proceedings against traffickers. This undermines 'law' enforcement efforts and allows traffickers to operate with impunity.

INCREASED RISK OF CRIMINALISATION AND DEPORTATION

Without appropriate accommodation, trafficking victims are mostly treated as undocumented migrants or offenders and face deportation, contrary to international human rights and victim-centred approaches.

DISINCENTIVE FOR VICTIM IDENTIFICATION

Victims are less likely to come forward if there is no place to refer them for care. This leads to underreporting and ineffective enforcement of anti-trafficking measures.

STRAIN ON CIVIL SOCIETY AND INFORMAL NETWORKS

In the absence of 'government' supported shelters, NGOs and informal networks are often forced to fill the gap, usually without sufficient funding, capacity, or long-term sustainability, limiting the consistency and quality of support.

Hence, it is important to have the necessary institutional framework, including the specialised shelter and the Anti-Trafficking Unit within the 'police department', as well as an Anti-Trafficking Coordinating Body, which will include different 'governmental' departments as well as civil society and coordinate all efforts against trafficking. Without a coordinating body, the response to trafficking in the northern part of Cyprus suffers from fragmentation, inefficiency, and limited impact.

In sum, an inconsistent implementation of key international obligations and human rights standards is observed both in the northern part and RoC. Specifically, there is a lack of implementation of the minimum standards for the identification, protection, and support in addressing the practical issues faced by victim-survivors. There is also a lack of gender-sensitive and trauma-informed systems and mechanisms. Finally, anti-trafficking efforts are plagued by poor data transparency and a lack of cross-community coordination.

TIMELINE: KEY LEGAL AND POLICY MILESTONES IN BOTH COMMUNITIES [PALERMO PROTOCOL ETC]

| YEAR | Republic of Cyprus Milestones | northern part of Cyprus |
|------|---|--|
| 2007 | | First international critique of exploitative visas |
| 2008 | Exploitative "Artiste visas" abolished | |
| 2008 | Ratified CoE Convention on Trafficking | |
| 2014 | Enacted Law 60(I)/2014 | |
| 2016 | NRM introduced | |
| 2020 | NAP 2023-2026 development begins | 'Article 254 added to Criminal Code' |
| 2022 | First conviction under new demand law | 'First (and only) conviction under Article 254' |
| 2024 | MCG shifted to Deputy Ministry of Migration | |

KEY FINDINGS: ASSESSMENT BY “3P” PILLARS

This section covers existing mechanisms and good practices (including what can be improved) for each pillar: prosecution, protection, and prevention, highlighting key findings for the RoC and northern part of Cyprus. We invite readers to approach this section as a road map for bridging policy with practice regardless of who is in power for each community and focusing on initiating policy change from any social positioning of the actors and despite the political and recognition issues that can get in the way. We invite those involved in social policy, law enforcement, asylum, migration and integration to contemplate solutions alongside civil society experts, activists, shelter officers, community members law makers and politicians.

For this assessment study in the RoC, three interviews were conducted with representatives of the Cyprus Anti-Trafficking Police Unit, social advisor at the Pournara Reception Centre, and coordinator of Sofi's House – Care Program for minor and young mother asylum seekers run by the Association for Prevention and Handling of Domestic Violence in the RoC. Each one provided insight into the daily realities and challenges of helping potential victims of THB and what needs to change to improve existing anti-trafficking mechanisms. Each of these organisations contributes to the anti-trafficking mechanism and particularly the NRM in place in the RoC. The Anti-Trafficking Police Unit investigates trafficking cases, Pournara Reception Centre supports identification and vulnerability assessment during the asylum process, and Sofi's House provides open shelter and holistic support to minor and young women (mothers) asylum seekers, including presumed victims of THB. It should be noted that two additional stakeholders were invited to participate in this study, namely: the coordinator-officer of the MCG and the coordinator of the governmental shelter for victims of THB. The former responded that, due to the recent administrative transfer of the MCG from the Ministry of Interior to the newly established Deputy Ministry of Migration, and having only recently assumed responsibilities in this area, they were not able to contribute at this time. A future interview was proposed once there is more familiarity with the portfolio. The latter did not respond to the invitation at all.

In the northern part of Cyprus, in-depth interviews have been carried out with the Human Rights Platform (HRP), Association of Women to Support Living (KAYAD), and the Nicosia 'municipality' Shelter for Domestic Violence Victims. HRP is a platform of civil society organisations that provides various services to victims of THB, such as: identification of victims, legal aid, psychological support, interpretation, etc. KAYAD is a women's organization that has been involved in anti-trafficking efforts for many years, working on advocacy and services. The Nicosia 'municipality's' shelter is the only shelter available in the northern part of Cyprus. Although the shelter is primarily intended for victims of domestic violence, in the absence of dedicated services, it occasionally accommodates a limited number of THB victims, depending on availability and space constraints.

Here follows a brief presentation of the key findings, structured in the three thematic pillars of prevention, protection, and prosecution.

Prevention

RoC: LACK OF COMPULSORY, SYSTEMATIC TRAINING FOR FRONT-LINE SERVICES, AWARENESS GAPS, AND LACK OF COMMUNITY ENGAGEMENT

All stakeholders agree on the need for systematic initial and in-service training and awareness to prevent trafficking and to understand the national referral mechanisms in place. While law enforcement officers in the RoC receive ongoing training to detect and address emerging trafficking methods, such as digital recruitment and the so-called “lover boy” tactic, prevention remains a significantly underdeveloped pillar. Stakeholders acknowledge that although trainings are delivered regularly, including through international exchanges, they tend to be concentrated within formal structures and do not extend meaningfully into community-based prevention work. A useful example cited by the interviewees is the EUAA offering an orientation class to explain to asylum seekers their healthcare rights or to explain to them the severity of some issues they will face once out of the camp in an attempt to prevent re-trafficking.

There is currently a lack of systematic outreach to high-risk groups, particularly non-European migrant communities. This gap is especially concerning given that presumed victims often come from these groups and may not be reached through formal state-led channels. Sofi’s House, a key non-state actor, contributes to prevention through psychoeducational efforts with its residents, including information about their rights and the risks of re-trafficking. However, the reach of such interventions is limited to those already engaged with services, and does not compensate for the absence of broader, proactive community engagement.

An issue highlighted by both Sofi’s House and the Cyprus Refugee Council is the role of religious or faith-based networks, particularly within African communities, which may unknowingly contribute to trafficking pathways. Victims recruited through these channels often face intense cultural and spiritual pressure to remain silent, making early identification and support more difficult. Despite some awareness among service providers, there are no formal mechanisms in place to engage these networks in prevention efforts.

Stakeholders recommend closer collaboration with schools, healthcare professionals, and grassroots organisations to build more effective, community-based prevention structures. These actors are often the first point of contact for individuals at risk and can play a critical role in early intervention.

Although the RoC has taken important legal steps, such as the 2023 conviction under legislation penalising the demand for services from trafficking victims, implementation remains uneven and data on enforcement is sparse. Greater transparency, especially by providing data in all official languages, is needed to ensure accountability.

Overall, prevention in the RoC is characterised by institutional awareness but limited outreach. There is an urgent need to move beyond isolated training efforts and invest in broader, community-driven prevention strategies, with particular attention to culturally sensitive and gender-specific approaches.

northern part of Cyprus: ABSENCE OF SYSTEMIC PREVENTION, PROBLEMATIC PROFILING, CIVIL SOCIETY-LED EFFORTS

The interviews carried out in the northern part of Cyprus reveal that prevention strategies are virtually non-existent. Entrance-point controls in the northern part of Cyprus that include profiling, denying entry based on nationality, and invasive phone searches are rooted more in racism and xenophobia than in any attempt to identify and prevent trafficking. Indeed, they further victimize vulnerable populations, while not protecting others.

No systemic campaigns target awareness, education, or regulation of high-risk sectors such as agriculture, domestic work, or entertainment.

The only steps taken to prevent the vulnerabilities that lead to trafficking is to locate and deport foreigners who have overstayed their ‘visas’.

Protection

RoC FORMAL NRM, SHELTERS (SOFI’S HOUSE, STATE), GAPS IN IMPLEMENTATION, POOR PSYCHOLOGICAL SUPPORT AND INTEGRATION MEASURES

The Pournara reception centre is often the first point of contact for refugees, migrants, and potential victims of trafficking, especially those arriving from the northern part of Cyprus via the UN-controlled buffer zone. Trained social advisors carry out vulnerability screening interviews to assess signs of trafficking and allow interviewees to choose the sex of their interviewer—essential for those who have been trafficked by women and may feel safer speaking to a man. As one advisor explained, the aim is to “understand through a vulnerability interview if a person might have indications of trafficking.”

After screening, (potential) victims are referred to relevant authorities. However, delays in accessing healthcare and psychological support severely slow the identification process. “I think one of the biggest issues is the support that the individuals get (...) in my experience I don’t see any support here,” one advisor shared. With only one doctor and no psychiatrist on site, referrals take time, and victims often receive no psychological care despite being entitled to it.

Many victims disengage due to long waits, lack of care, and boredom stemming from inactivity. Some leave the camp, losing access to RoC welfare and going unmonitored. Limited job opportunities and inefficient other social integration services hinder recovery, leaving potential victims under-occupied and uncertain about their future.

Sofi’s House, though no longer limited to recognised victims of THB, houses women based on vulnerability. Services include legal aid, psychosocial support, parenting, and employment guidance. Unlike the closed state shelter, Sofi’s House is an open, community-based model offering dignity and individualised care. “That makes a difference because it gives women more freedom and dignity,” said one participant.

Challenges include limited access to medical specialists and delays in medical appointments, inconsistent referral eligibility, long delays in victim identification in the absence of fast-track referral pathways. A key recommendation from Sofi’s House is the creation of a specialised one-stop centre for THB victims, similar to the Women’s House model for domestic violence victims-survivors, to centralise and improve access to multidisciplinary services.

While NGO workers are aware of the National Referral Mechanism (NRM), many reports long delays in multiagency collaboration. The Office of Combating Trafficking in Human Beings considers the NRM functional and responsive, but NGO workers highlight weak implementation, especially following the transfer of the MCG oversight to the Deputy Ministry of Migration. Stakeholders report irregular MCG meetings and a lack of clarity about its future direction.

northern part of Cyprus:

NO NRM, LIMITED NGO-LED SUPPORT, NO 'STATE' SHELTER, DEPORTATION OF VICTIMS

Concerning the northern part of Cyprus, there is no coordinating body against trafficking, which makes trafficking solely a 'police' matter. As mentioned above, there are no public services available for victims of trafficking and no public shelter or hotline.

There is no referral mechanism and no public victim identification mechanism. Identification relies almost entirely on NGOs, particularly the HRP, which conducts ad hoc screenings based on international protocols. Only those who actively seek help are identified, and even then, deportation remains the typical outcome, which prevents an estimated 80% of potential victims from coming forward for fear of deportation. Once identified by the HRP, generally victims are taken to the 'municipality' shelter for up to 6 weeks due to limited capacity.

Currently, there are two hotlines. One, intended for victims of violence in general, is administered by the Nicosia 'municipality', which also runs the only shelter for victims of violence. The other is operated by the HRP, an NGO that offers legal services for victims. A hotline (157) was established by the 'authorities' when international pressure was high, but it never became functional.

Some trainings were carried out for various departments on THB by NGOs, but civil servants who were trained have not been able to use this training since no 'authorities' were formed to combat trafficking.

Experts interviewed for this project mentioned political will as the main reason for the lack of action against trafficking. The trainings and action, mostly organised by civil society, were carried out when more receptive political actors were in power. One interviewee described the period between 2015 and 2020 as the 'Golden Ages' for anti-trafficking action, as there was openness to international norms and the role of civil society, including as a watchdog.

There is no offer of formal support services for trafficking victims. Shelter options are limited to only one facility for domestic violence victims, with severe limitations for men and children. Civil society is often left to provide legal, psychological, and housing support through makeshift and unsustainable means. These measures are piecemeal and are by no means comprehensive. Deportation remains the default response, even for identified victims. Due to the traumatising experience, trafficking victims also choose to be deported.

Prosecution

RoC:

DEDICATED ANTI-TRAFFICKING POLICE UNIT, INTERNATIONAL COOPERATION, BUT LOW CONVICTION RATES

According to the RoC Anti-trafficking Police Unit, the anti-trafficking framework has been successful in integrating a gender-based dimension by enhancing and training their staff and improving their ability to assess the needs of victims. They interpret the legal framework in place in the RoC as very strong and comprehensive in supporting the needs of the victims. However, there is no information available on whether such training, initial and in-service, is obligatory and available systematically. It should be noted that the legal framework in place in the RoC has been shaped by the EU Anti-trafficking Directive, which is the fundamental EU legislative act addressing trafficking in human beings, as well as the Council of Europe Convention on Action against Trafficking in Human Beings. Staff receive a standard three-day yearly training on interviewing techniques with victims and prosecution procedures. They also attend other conferences and seminars abroad as part of the training offered by CEPOL, The European Union Agency for Law Enforcement Training, on sexual exploitation as well as transnational knowledge exchanges among law enforcement authorities across the EU. The AUAA, IOM, and Frontex offer additional training in Cyprus or as part of transnational programmes. The Anti-trafficking Police Unit currently has eleven staff members, though they would like to have more, since working with victims requires significant resources and continuous follow-up. Despite these efforts, conviction rates remain low, and inter-agency coordination delays victim protection and legal processes.

A 2020 MoU between the Police, Social Welfare Services, and the Labour Department improved multi-agency collaboration, according to the Police representative. This change has been interpreted by the Police as a key shift in gaining trust from victims-survivors, as they are offered protection from deportation and benefit from a 24/7 hotline and victim-friendly procedures. However, access to information across the divide remains limited to the Bi-communal Technical Committee on Crime. NGOs call for more efficient cross-divide communication and cooperation.

When the police receive some information about a potential case, they assess it and then they coordinate an operation with the welfare services and/or labour inspectors. When they identify victims, they transfer them to the government shelter. They also have a close cooperation with NGOs that can provide them with shelters and some social welfare services. When cases involve the area administered by 'authorities' in the northern part of Cyprus, the anti-trafficking department can access information only via the Bi-communal Technical Committee on Crime established by the Greek Cypriot and Turkish Cypriot leaders as part of the peace negotiation process. The Cyprus police also reported having a good cooperation with Europol and other countries when international cooperation is needed for an investigation happening in the RoC. Nevertheless, Sofi's House raised concerns that the identification and referral process can take up to six months, often delaying access to justice or support. While the police follow up quickly in some cases, delays in confirmation or action can cause harm or re-traumatisation, especially when cases are not straightforward. This concern has also been expressed by other NGOs.

The law enforcement's collaboration with NGOs such as SPAVO is valued and significant for shelter placement and follow-up care. However, the lack of cooperation with the Turkish Cypriot 'police' creates a significant barrier, especially for victims trafficked in the northern part. Although the Bi-communal Technical Committee on Crime provides a communication channel, which according to other NGOs could be made more efficient, there is no operational-level policing coordination across the divide.

northern part of Cyprus:

ONLY ONE CONVICTION, LEGAL TEXT UNDER-IMPLEMENTED, NO SPECIALISED 'POLICE UNIT', 'JUDICIAL' RESISTANCE

As mentioned above, the northern part of Cyprus lacks a comprehensive anti-trafficking 'legislative' framework. The only legal provision addressing trafficking is a single article within the 'Criminal Code', which 'law' enforcement claims conflicts with other 'national legislation'. Further, 'law' enforcement often claims it is "impossible" to prove THB cases and refrains from sending the cases to prosecutors, leading to non-prosecution of even obvious cases of trafficking.

The absence of a specialised anti-trafficking unit results in a lack of institutional knowledge and investigative capacity. Generally, 'police' and 'authorities' feel helpless in dealing with trafficking cases. Interviews with experts suggest that there is a lack of awareness regarding trafficking among 'police', 'prosecutors', and 'judges', and a hesitancy by the 'police' to send trafficking cases to the 'prosecutor's office'. Interviews suggest that VAWU is a good example where the specialised 'police' unit can push cases and convince 'prosecutors' to prosecute violence cases by building expertise and institutional knowledge and experience.

In 2024, there was a case in which around 600 foreign workers complained of ill treatment at a company locally owned by responsible bodies: Cypfruvex. The first four workers who spoke out were put in a hotel by the HRP, but when the numbers rose after initial interviews and investigation, the HRP was helpless. The 'authorities' could not even provide translators who could help interview the victims. In the end, the case was not dealt with as a trafficking case, and victims received no 'legal' redress. They were transferred to other employers and no prosecution took place, highlighting systemic neglect.

Furthermore, the lack of international recognition of the northern part of Cyprus severely limits cooperation with global anti-trafficking mechanisms. 'law' enforcement and 'judicial' bodies, including 'police', 'prosecutors', and 'judges', often lack the necessary training and gender and trauma sensitivity to effectively investigate and prosecute trafficking cases. This institutional inertia is exemplified by the Cypfruvex case, where rather than treating the case as trafficking, 'authorities' framed it as a labour dispute. To date, only one conviction has been recorded, and even in that instance, the victim was ultimately deported.

There is an urgent need for gender-sensitive, victim-centred training across all relevant institutions, including the 'police', 'social services', 'ministry of employment', 'prosecutors', and 'judges'. However, interviews reveal resistance to such training, particularly among members of the 'judiciary' and 'prosecution'.

Without guaranteed rights and protections, victims are unlikely to come forward. Experts report that many individuals (up to 80%) who initially reach out for help later withdraw due to fear of deportation. As one expert noted, "we used to struggle to get victims of violence to speak up as well, but once we secured convictions and favourable court outcomes, trust began to grow. It is similar with victims of trafficking. A functioning system is necessary for that trust to take root."

This underscores the critical importance of comprehensive anti-trafficking 'legislation' that includes formal identification and referral mechanisms and provides interpretation, psychological and medical support, and legal assistance to victims. In its absence, the current 'law enforcement' approach not only fails to protect victims but often re-traumatises them.

INFOGRAPHIC:

THE 3P EFFECTIVENESS BAROMETER FOR EACH COMMUNITY

Each “P” (Prosecution, Prevention, Protection) rated qualitatively as:



ESTABLISHED
AND FUNCTIONING



EXISTS BUT
UNDER-IMPLEMENTED



ABSENT OR SEVERELY
DEFICIENT

| PILLAR | Republic of Cyprus | northern part of Cyprus |
|--------------------|-------------------------------------|------------------------------------|
| Prevention | ⚠ Limited campaigns, some trainings | ✗ No systemic prevention |
| Protection | ⚠ Formal NRM, but serious delays | ✗ No shelter or referral mechanism |
| Prosecution | ⚠ Dedicated unit, but low results | ✗ Only one conviction, no unit |

IDENTIFIED GAPS AND OPPORTUNITIES

Despite structural differences, both the RoC and the northern part of Cyprus face critical and, in some cases, overlapping challenges in their anti-trafficking response. The table below summarises key gaps and corresponding opportunities for improvement.

| THEMATIC AREA | Republic of Cyprus | northern part of Cyprus |
|--|--|---|
| Victim Identification | Delays in identification (up to 6 months); inconsistent implementation of the NRM; lack of trauma-informed screening tools. | No formal action plan in place; no systematic identification procedures; civil society fills the gap informally. |
| Psychological and Medical Support | Inadequate mental health care at reception centres (e.g., Pournara); long delays in referrals; no psychiatric services. | Limited or no access to specialised health or psychological services for victims; absence of trauma support system. |
| Shelter and Housing | Open shelter model (e.g., Sofi's House) offers best practice but lacks resources and public support; state shelter remains closed. | No trafficking-specific shelter; victims placed in domestic violence shelter if space permits. |
| Coordination and Governance | Weak interagency collaboration; irregular MCG meetings; uncertainty since move under Deputy Ministry of Migration. | No coordinating body or interagency mechanism for anti-trafficking work; complete institutional vacuum. |
| Gender-sensitive Integration | Limited access to childcare, education, and employment; needs of women with children often overlooked. | No gender-specific services for integration or recovery; services rely entirely on underfunded civil society. |
| Legal Framework | Comprehensive legislation (Law 60(I)/2014) in place but under-implemented; no National Rapporteur. | 'Article 254' criminalises trafficking but lacks supporting legal framework; no formal policies or action plans. |
| NGO Role and Sustainability | NGOs play a central role but remain underfunded and structurally unsupported. | Civil society carries entire burden of victim support and identification; no public support or cooperation. |

CROSS-CUTTING RECOMMENDATIONS FOR BOTH RoC and northern part of Cyprus

CREATE OR STRENGTHEN VICTIM REFERRAL MECHANISMS

through trauma-informed, gender-sensitive, and rights-based approaches.

INSTITUTIONALISE INTERAGENCY COORDINATION PLATFORMS,

ensuring regular meetings, clear mandates, and shared protocols.

ALLOCATE PUBLIC FUNDING TO CIVIL SOCIETY,

recognising their essential role in victim identification, support, and advocacy.

FUND AND SUPPORT OPEN SHELTER MODELS

that promote dignity, long-term integration, and psychosocial stability.

INVEST IN FRONTLINE TRAINING

for related officers and medical staff on THB indicators and cultural sensitivity.

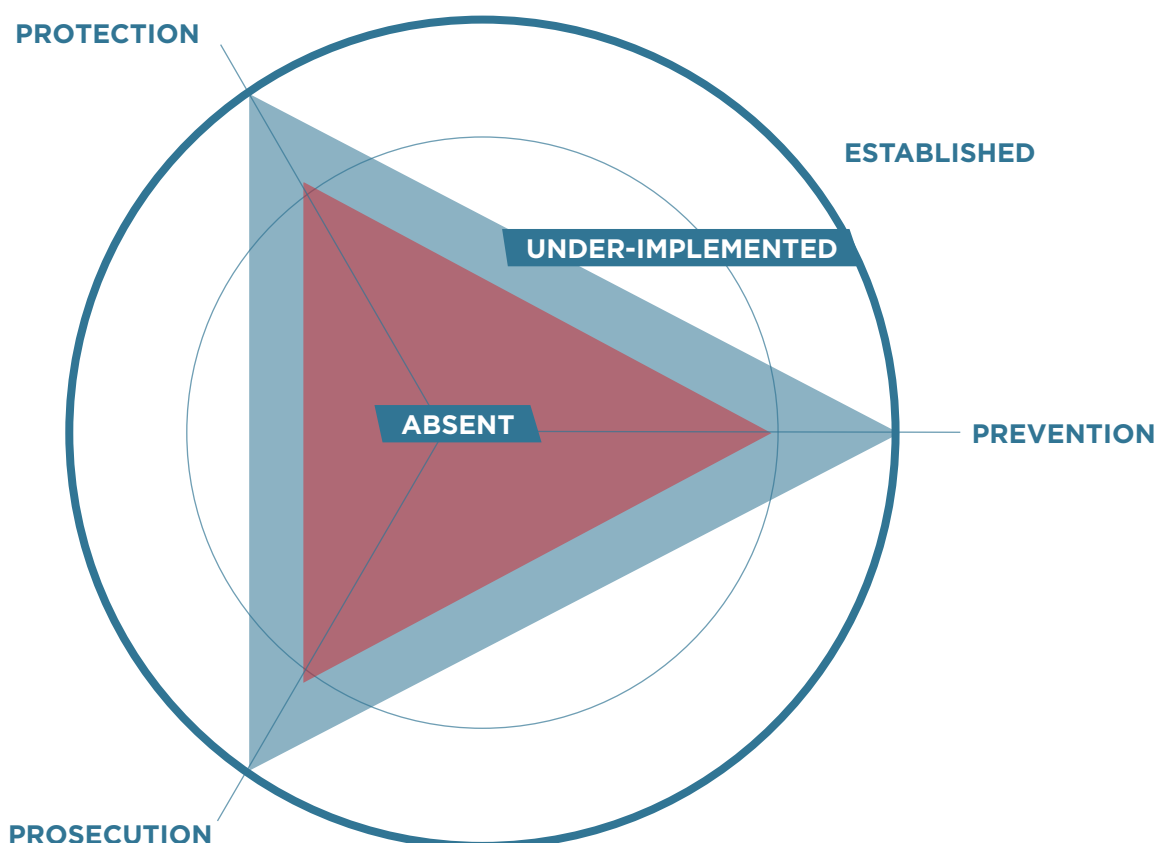
DEVELOP OR REVISE NATIONAL ACTION PLANS,

aligning them with international human rights standards and ensuring evaluation.

Below is a radar chart comparing the **effectiveness of anti-trafficking measures** using the 3P framework (Prosecution, Prevention, Protection). This assessment reveals that the RoC has structures in place but struggles with implementation and the northern part of Cyprus lacks foundational mechanisms.

EFFECTIVENESS OF ANTI-TRAFFICKING MEASURES IN CYPRUS

► Republic of Cyprus (RoC) ► northern part of Cyprus (TCc)



RECOMMENDATIONS

Reflecting on the findings of this report, this section outlines next steps for the responsible bodies, civil society actors, and international partners from two angles—over time (short-, medium- and long-term) and through the 3P prism. It proposes a phased approach, while acknowledging the distinct legal and institutional landscapes that exist.

Short-Term Recommendations (0–12 Months)

FOR BOTH

- Establish or strengthen clear, survivor-centred referral mechanisms and fast-track procedures to avoid delays in identification and support.
- Provide systematic, trauma-informed and gender-sensitive training to all frontline actors (related officers, medical staff, interviewers).
- Create interagency working groups (or revitalise existing ones) with defined mandates and regular meeting cycles.
- Translate and disseminate materials related to THB laws and rights in key community languages and in the key languages of the victims-survivors.
- Continue to nurture island-wide networks of experts and civil society actors to open and maintain channels of communication and build habits of cooperation. Build on the experience and successes of initiatives such as the United Action Against Human Trafficking project.

FOR RoC

- Reinstate regular meetings of the MCG and clarify its mandate under the Deputy Ministry of Migration.
- Address gaps in psychological care, including by assigning psychiatrists to reception centres (e.g. Pournara).
- Develop and implement fast-track screening procedures for victims of trafficking within reception and asylum systems.

For northern part of Cyprus

- Initiate the drafting of a comprehensive anti-trafficking legal framework aligned with international standards.
- Conduct a baseline assessment of THB, with the support of civil society and international actors.
- Identify and designate focal points within legal enforcement, health, and welfare sectors for THB coordination.

Mid-Term Recommendations (1–3 Years)

FOR BOTH

- Allocate sustainable public funding to support the work of NGOs and shelters providing essential services to survivors.
- Invest in open shelter models and gender-sensitive accommodation that promote dignity and long-term recovery.
- Develop local or island-wide prevention campaigns targeting youth, migrant communities, and employers.

FOR RoC

- Establish a specialised one-stop centre for victims of trafficking, based on the Women's House model.
- Appoint and fund an independent National Rapporteur to evaluate and monitor anti-trafficking measures.

For northern part

- Establish and support dedicated anti-trafficking capacity within 'law' enforcement as well as a coordinating body responsible for policy.
- Develop an action plan with measurable indicators and stakeholder engagement.

Long-Term Recommendations (3–5 Years)

FOR BOTH

- Explore and pilot deeper bi-communal cooperation on THB through cross-community training, information exchange, and joint prevention efforts.
- Encourage the development of harmonised THB indicators and shared data collection tools across the island.

FOR RoC

- Institutionalise a monitoring and evaluation framework for the National Action Plan.

For northern part of Cyprus

- Secure legal and institutional reforms through sustained capacity-building and transparency.

These recommendations are grounded in the findings of this assessment and shaped by the voices and experiences of frontline actors. Their implementation requires political will, inter-agency coordination, and sustained support from local and international stakeholders.

IN-DEPTH/CROSS-CUTTING RECOMMENDATIONS

Reflecting on the findings of this report, this section outlines actionable next steps for authorities, civil society actors, and international partners. It proposes a phased roadmap, while acknowledging the distinct legal and institutional landscapes in the RoC and the northern part of Cyprus.

ESTABLISH BI-COMMUNAL KNOWLEDGE-SHARING PLATFORM

Establishing a bi-communal knowledge-sharing platform for anti-trafficking can be a transformative initiative to enhance collaboration, improve victim support, and strengthen prevention and enforcement mechanisms as well as data sharing across the island. Its objectives would be to:

- (1) share best practices, case studies, data, and research on human trafficking,
- (2) enable collaborative planning of anti-trafficking strategies, training, and victim support, and
- (3) support a unified front against traffickers exploiting the island's division.

INCREASE DATA TRANSPARENCY AND MULTILINGUAL AVAILABILITY

Similarly, by ensuring data transparency and multilingual availability, you can have:

- (1) equal access and understanding for all users regardless of language or community,
 - (2) greater accountability, trust, and credibility, and
 - (3) stronger engagement from a broader range of stakeholders, including victims, frontline workers, policymakers, and NGOs.
- (4) Strengthen civil society networks across the divide

FOR RoC Protection

- Establish a survivor-centred, multi-agency one-stop centre for THB victims, modelled on the Women's House, to provide integrated services including healthcare, legal, psychological, and housing support.
- Provide targeted mental health and legal services.
- Operationalise a holistic/multi-agency gender-sensitive, trauma-informed, and culturally appropriate care model with clear guidance for all agencies and institutions working with THB victims.
- Ensure the provision of psychological and mental health support through better coordination and staffing of SWS and trained interpreters.

Prosecution

- Improve the implementation of the NRM and fast-track victim identification.
- Strengthen the Office of the Commissioner for Administration and Protection of Human Rights to function as National Rapporteur with dedicated resources and legal authority.
- Introduce regular, mandatory, and standardised training for all relevant stakeholders, including frontline professionals, medical staff, police officers, and social workers.

Prevention

- Monitor and evaluate the MCG more systematically.
- Strengthen the functioning and transparency of the MCG post-transfer from the Ministry of Interior to the Deputy Ministry of Migration, ensuring regular meetings, representation of CSOs, and community outreach.
- Strengthen outreach campaigns and community-based prevention targeting vulnerable groups, with multi-lingual and culturally tailored materials that are made accessible to the affected communities and the wider public.
- Promote cross-community cooperation through joint training and knowledge exchange activities.
- Monitor and evaluate the National Action Plan (2023–2026) through an independent body and allocate specific budgets and indicators for implementation.

For northern part of Cyprus

Overall

- Enact comprehensive anti-trafficking ‘law,’ set up Anti-Trafficking ‘police’ Unit and MCG, and develop ‘national action plan’ and victim identification mechanism.
 - Prepare a **Strategy and ‘National Action Plan’**, taking into account all data and experience of NGOs and experts as well as testimonies of victims of THB. Additionally, a separate ‘National Action Plan’ for child victims of THB needs to be developed.
 - Legal text on **Anti-Trafficking** is of utmost importance, which will lay the groundwork for all efforts for prosecution, protection, and prevention.
 - It is also important to remember that trafficking is a form of violence mostly against women and children, making it necessary to consider gender-specific forms of exploitation as well as child victims.
 - A systematic and specialised training is required for ‘law’ enforcement, entry guards, employment inspectors, and social welfare workers.

To address the previously mentioned structural deficiencies in anti-trafficking efforts in the northern part, a comprehensive framework for the protection, prosecution, and prevention of trafficking is needed. This comprehensive ‘national’ action needs to be coordinated through a specific Anti-Trafficking Coordinating Body, which will include different ‘governmental’ departments as well as civil society. **An Anti-Trafficking Coordinating Body** typically oversees national strategy, ensures implementation of ‘laws’, and aligns efforts across ‘government departments’, civil society, and international partners. In its absence, anti-trafficking initiatives remain fragmented and reactive rather than strategic and sustained.

Protection

- Produce a **‘Handbook for the Identification of Victims’**. This will provide guidance on the first contact with a victim, information to be provided to potential victims, recognition of possible trauma and behaviour of victims, indicators that may reveal a case of THB, rules to be observed when in contact with potential victims, possible reaction to the victims’ observed reserved attitude and reluctance to cooperate with the ‘police’, etc.
- **Formalise a Victim Identification Mechanism**. A standardised ‘national referral’ and identification mechanism must be developed, involving ‘police’, ‘social services’, civil society, and trained medical and psychological professionals. The model should mirror successful regional practices while being adapted to the northern part of Cyprus.

- **Establish a pool of quality and independent interpreters as well as psychologists and social welfare workers** who will be called in when potential cases arise. They should be trained on gender and trauma sensitivities as well as trafficking.
- Carry out a **regular assessment of the needs of victims** as well as systematic research on different forms of trafficking.
- **Establish a Specialised Shelter for Trafficking Victims.** A dedicated shelter facility that accommodates women, men, and child victims of trafficking is needed. The shelter must be equipped to offer comprehensive care, including psychological support, legal assistance, and secure housing.
- **Ensure Temporary Residency and Non-Refoulement Protections.** Victims should be granted temporary residence permits during investigations and trials. Deportation must be halted for identified victims, with safeguards against re-victimisation.
- In addition to these protections, victims must be offered psychological, legal, and physical assistance and support as well as a 30-day recovery/reflection period.

Prosecution

- **Enact a Comprehensive Anti-Trafficking ‘Legislation’.** The ‘Criminal Code’ must be supplemented by a comprehensive anti-trafficking ‘legislation’ in line with the Palermo Protocol. This ‘law’ should define trafficking comprehensively, include provisions for victim protection, and establish clear penalties for perpetrators.
- **Establish a Specialised ‘Police Unit’.** A specialised anti-trafficking unit should be created within the ‘police force’, composed of trained officers with cultural and gender sensitivity. Institutional knowledge should be preserved by ensuring continuity of personnel. There should be a few ‘police’ officers trained on THB in every district.
- **Train ‘Police’, ‘Prosecutors’, and ‘Judges’ as well as Teachers, Entry Points Control Officers, Social Workers and Employment Inspectors.** Mandatory training programs must be institutionalised, covering identification, investigation, trauma-informed victim interviews, and legal procedures. ‘Judges’ and ‘prosecutors’, often resistant to external input, must be required to participate as part of professional development. Training of THB should also be mandatory in ‘police academy’.

Prevention

- **Run Public Awareness Campaigns.** There must be island-wide awareness campaigns to educate the public, migrants, and employers about the risks, signs, and penalties of trafficking. These campaigns should utilise multiple platforms and languages to reach at-risk communities. They should aim to inform potential victims while also targeting demand and labour exploitation.
- **Regulate High-Risk Sectors.** Inspections and labour oversight in sectors such as domestic work, construction, agriculture, and entertainment must be intensified. Employers must be held accountable for documentation, fair wages, and humane living conditions.
- **Entry Points Practices and Measures to Enable Legal Migration.** Entry practices must be aligned with human rights standards. Instead of banning or profiling entire nationalities, ‘authorities’ should be trained to conduct evidence-based assessments of trafficking risk indicators.

- **Amend Employment Conditions.** It is also important to amend employment conditions for foreigners to allow for a change of employer, making working conditions less conducive to trafficking.
- **Promote Regional, International and Civil Society Cooperation.** Although political recognition remains a barrier, civil society cooperation across the island can help fill the institutional gap. Information sharing, joint press releases, and parallel monitoring activities should continue and expand. It should be noted that international pressure on 'authorities' is a critical factor for change. It is crucial to keep up pressure on the northern part of Cyprus 'authorities' to ensure necessary steps are taken in combatting trafficking.
- **Step Up Inspections.** Step up 'police' and employment inspections of entertainment venues and other risky businesses where cases of THB can be found. Step up 'police' and employment inspections to identify cases of labour exploitation.

MATRIX OF RECOMMENDATIONS

Traffic-light colour-codes showing implementation feasibility and urgency:

 **FEASIBLE NOW**  **MEDIUM EFFORT/ NEEDS POLITICAL WILL**  **STRUCTURAL/ POLITICAL CONSTRAINT**

| AREA | RoC: ACTION NEEDED | northern part: ACTION NEEDED | SHARED PRIORITIES | FEASIBILITY |
|--------------------------|---|---|---|------------------------------------|
| Legal Reform | Amend Law 60(I)/2014 to establish Rapporteur | Enact comprehensive anti-THB legislation | Harmonise legal concepts and victim definitions | Medium effort/needs political will |
| Institutional | Strengthen MCG, ensure regular meetings | Establish coordinating body, anti-THB police unit | Establish bi-communal platform for exchange | Structural/ political constraint |
| Victim Support | Improve access to psychological care & legal services | Create THB-specific shelter, referral mechanism for victims | Victim-centred/ trauma informed training across services; develop gender-sensitive support | Medium effort/needs political will |
| Prevention | Expand public campaigns and digital awareness | Launch systematic and systemic awareness efforts | Target demand, online recruitment, digital threats and racism | Feasible now |
| Capacity Building | Evaluate NAP and NRM; improve monitoring | Roll-out/Provide multi-sector trainings ('police'; 'judiciary', social workers, health professionals) | Step-by-step roadmap for implementation shared through the Bi-Communal Technical Committees | Feasible now |

CONCLUSION

While the legal and institutional capacities vary significantly between the Republic of Cyprus and northern part of Cyprus, both communities struggle with implementation, victim protection, and intra-island cooperation. Political realities create additional obstacles, yet the human rights imperative demands harmonised, victim-centred, and gender-sensitive responses. A shared strategy is essential to combat trafficking island-wide.

The findings reveal that while the RoC has made important steps in strengthening anti-trafficking mechanisms, persistent gaps in implementation, coordination, and victim-centred support and care compromise the system's effectiveness. The integration of insights from frontline service providers such as Sofi's House reveals valuable practices in gender-sensitive support and long-term integration. Urgent needs for expanded psychological, psychoeducational services, legal aid, inter-communal coordination, and accessible pathways to justice remain; they echo the advocacy demands also made by other front-line NGOs in the field. In addition, data collection must be enhanced and made available in the official languages of Cyprus and information must be made available to the affected communities in understandable language(s).

A more inclusive and standardised approach to the National Referral Mechanism alongside investment in training, community awareness, and structural reforms - is necessary to better support victims of THB across the divide and to prevent future exploitation, especially when working towards an inclusive, shared framework. In addition, given the lack of cooperation on anti-trafficking efforts across the divide, it becomes more urgent that the Bi-Communal Technical Committees on Crime and Criminal Matters and Gender Equality—and others, given the wide-reaching effects and implications of THB—take a more active role in prevention actions facilitating knowledge exchange as well as in supporting law enforcement efforts.

Given the comprehensive legal and policy framework in place by the RoC, what is missing is cohesion and implementation across the board. Even more important is substantial political and institutional will to address anti-trafficking action and policy not just as a law enforcement issue or a migration issue, but also as a human rights issue.

The northern part of Cyprus remains ill equipped to address human trafficking effectively due to legal, institutional, and political shortcomings. Civil society has taken on roles typically reserved for the responsible bodies, but this model is unfunded, unrecognised, unsustainable, incomplete and inadequate. Through targeted 'legislative' reform, institutional development, and rights-based victim protection measures, the northern part of Cyprus can begin to fulfil its responsibilities under international and EU human rights law. The creation of a functional anti-trafficking infrastructure is not only a legal obligation, but also a moral imperative.

In conclusion, this assessment highlights the need for and the inherent value of a harmonised anti-trafficking approach in Cyprus given the political situation and the constantly changing characteristics of THB. Afterall, it is a crime that thrives when structures and mechanisms are absent and/or broken. Finally, this assessment study underscores that building shared standards and meaningful cooperation despite political realities is of paramount importance. Victims of human trafficking deserve immediate action.

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ANNEXES

ANNEX I - SEMI-STRUCTURED INTERVIEW GUIDE FOR GREEK CYPRIOT STAKEHOLDERS

Conducted by: Christina Kaili

INTRODUCTION

- Thank you for participating in this interview. This research aims to assess anti-trafficking mechanisms in the Greek Cypriot community by the authorities (the Republic of Cyprus), with a particular focus on identifying gaps, best practices, and potential adaptations for a future mechanism in the northern part of Cyprus and ‘authorities’.
- The study takes a feminist approach, emphasizing gender-sensitive and victim-centred policies, as well as the broader socio-political structures influencing anti-trafficking responses.
- Your insights are invaluable in shaping recommendations that can improve coordination, protection, and justice for survivors of trafficking.

CONFIDENTIALITY AND CONSENT

- This interview is confidential, and no personally identifiable information will be included in the final report unless explicit consent is provided.
- If you agree, we would like to record this interview for accuracy.
- You are free to skip any questions or stop the interview at any time.

Background, Role in Anti-Trafficking Efforts

- 1 Can you briefly introduce yourself and your role in anti-trafficking efforts?
- 2 How does your organisation contribute to combating trafficking in human beings (THB)?

Overview of the Anti-Trafficking Referral Mechanism

- 1 How would you describe the current referral mechanism for victims of trafficking in the Republic of Cyprus?
- 2 What are the strengths and weaknesses of the existing referral process?
- 3 Are there informal referral mechanisms in place? Who operates them, and why are they needed?
- 4 In your experience, what factors most influence whether a trafficking victim is identified and referred for assistance?
- 5 What are the practical challenges in implementing the provisions of the national referral mechanism across the divide?

Prevention

- 1 What steps are taken, if any, in the prevention of THB in the TCc?
- 2 Are there measures taken to inform possible victims of trafficking?
- 3 Are there any actions taken to discourage demand for trafficking?
- 4 What prevention strategies have been effective in reducing trafficking, especially among non-European victims?
- 5 Have organizations ever promoted community-based campaigns to help potential victims recognise trafficking in human beings (all forms of THB, incl. trafficking for sexual exploitation)?

Protection and Support for Survivors

- 1 What are the main support services available for trafficking victims (e.g., shelter, legal aid, psychological support)? What is done to protect the victims from re-trafficking after they get identified?
- 2 Are these services gender-sensitive, trauma-informed and culturally appropriate for victims coming from a non-European background?
- 3 What strategies or tools are in place to keep victims informed about their rights, case status, and available services? Could the procedures of information-sharing be more transparent?
- 4 What are the main gaps or challenges in victim support services (e.g., accessibility, funding, legal barriers)?
- 5 How effective is the current shelter system for adult women survivors? Are there any needed adaptations for improving support?
- 6 What happens to trafficking victims who do not fit the shelter's eligibility criteria (e.g., male victims, LGBTQ+ individuals, non-asylum seekers, children)?



Legal Framework and Law Enforcement

- 1** Can you describe the provisions in the criminal code on trafficking in human beings? Are there any other legal provisions on human trafficking?
- 2** Does the anti-trafficking framework sufficiently integrate gender equality principles?
- 3** What is the role of the dedicated anti-trafficking police unit? What challenges do they face?
- 4** Do they collaborate with Turkish Cypriot 'police' in cases of THB? If they report reluctance to investigate trafficking cases:
- 5** How does the lack of police intervention affect victims' safety and access to justice in Northern Cyprus or the South?
- 6** What strategies they think could be used to encourage the Turkish Cypriot 'police' to take sex trafficking crimes more seriously?
- 7** How can the bi-communal collaboration be improved?
- 8** How often do you organise trainings for police officers on interviewing techniques specialising to victims of crime (according to gender-sensitive and victim-cantered methods to avoid re-victimisation)?
- 9** How does law enforcement collaborate with NGOs and international organisations on THB cases?
- 10** Are there any legal barriers that prevent trafficking survivors from receiving full protection and justice and residence permits?

Identification and Vulnerability Assessments

- 1** How are trafficking victims identified in different contexts (e.g., asylum process, police reports, social services)?
- 2** What is the process of identifying victims in Pournara Reception Centre? If a person is trafficked, and would like to apply for asylum in RoC, how does the identification work? How does their status and rights shape?
- 3** What are the key challenges in identifying and recognizing trafficking cases?
- 4** Are there statistics on referrals and recognitions? If not, why?

Institutional and Political Challenges

- 1 What are the main institutional gaps in Cyprus' response to trafficking?
- 2 What role does political will play in anti-trafficking efforts?
- 3 How does bi-communal cooperation (or lack thereof) affect anti-trafficking responses?
- 4 Have you engaged with the Bicommunal Technical Committee on Gender or Crime? If so, what has been their response to trafficking-related concerns?

Recommendations and Future Adaptations

- 1 What changes would you recommend improving the anti-trafficking framework in Cyprus?
- 2 Are there best practices from other countries or regions that could be adapted?
- 3 How can the national referral mechanism be improved to better protect victims? Which aspects?
- 4 Is it something that could be extended to the Turkish Cypriot 'authorities'?
- 5 What structural or policy adaptations could be made to enhance cross-community collaboration? Or name 3 priorities for next steps in this regard.

Wrap up and Remarks

- 1 Is there anything else you would like to add that we haven't covered?
- 2 Would you be open to a follow-up discussion if we need further clarification?

Thank you for your time and insights!

ANNEX II SEMI-STRUCTURED INTERVIEW GUIDE FOR TURKISH CYPRIOT STAKEHOLDERS

Conducted by: Mine Yücel

INTRODUCTION

- Can you briefly introduce yourself and your role in anti-trafficking efforts? How does your organisation contribute to combating trafficking in human beings (THB)?
- Who coordinates the efforts against trafficking? Is there a govt body or is it NGO driven?
- Are there trainings for different departments that deal with victims of trafficking? Who provides these trainings?
- Is there any data collected on trafficking victims? Do police have specific data on trafficking?

Protection

- 1** Currently is there a mechanism (formal or informal) in place for the identification of victims of trafficking in the TCC? Is this done by the 'authorities' or NGOs?
- 2** What are the strengths and weaknesses of this mechanism?
- 3** Is there a referral mechanism in place? What happens to victims who are identified?
- 4** What needs to happen to better identify victims of trafficking?
- 5** What rights, if any, do victims have once they are identified? Are they informed about their rights or services that might be available to them? And by whom?
- 6** Are there mechanisms in place to protect identified victims from revictimisation? What happens to the victims once they are identified?
- 7** Are there inspections carried out by the 'labour department'? Are labour inspectors trained on trafficking? Do they participate in the identification of victims? Could they?
- 8** Is there any assessment of victims' needs carried out by the 'authorities'? Or the NGOs?
- 9** Are victims provided with any services? Legal or psychological? By whom?
- 10** Is there any assistance to victims with accommodation or other services such as psychological, educational, training, integration services etc?
- 11** Are these services gender-sensitive, trauma-informed and culturally appropriate for victims coming from a non-European background?
- 12** What are the main gaps or challenges in victim support services (e.g., accessibility, funding, legal barriers)?
- 13** How effective is the current shelter system for adult women survivors? Are there any needed adaptations for improving support? Is there a need for a shelter specific to victims of trafficking?



- 14** What happens to trafficking victims who do not fit the shelter's eligibility criteria (e.g., male victims, LGBTQ+ individuals, non-asylum seekers, children)?
- 15** What about child victims of trafficking? Are there any services specific to children?

Prosecution

- 1** Can you describe the provisions in the 'criminal code' on trafficking in human beings? Are there any other legal provisions on human trafficking?
- 2** Does the anti-trafficking framework sufficiently integrate gender equality principles?
- 3** What is needed for the effective prosecution of traffickers?
- 4** Is there cooperation with GC police in Trafficking cases?
- 5** What needs to happen to make victims feel safer and have access to justice in the northern part?
- 6** Are victims of trafficking punished for any involvement in unlawful activities?
- 7** Is there a special 'police' unit against trafficking? Is it possible to establish one? Who will do the training? Is there need for international support? Would it be possible to get help from GC authorities or NGOs?
- 8** Is there adequate investigation of sex trafficking cases in the northern part, in your opinion? If not, why do you think that is? What strategies could be used to encourage and empower the police to be more effective in investigating sex trafficking crimes more successfully?
- 9** Does the Turkish Cypriot legal enforcement system understand the gendered and cultural dynamics of trafficking from outside of Europe? What improvements are needed?
- 10** How often are 'police officers'/labour inspectors/health workers etc trained on interviewing techniques specialising to victims of crime [according to gender-sensitive and victim-cantered methods to avoid re-victimization]?
- 11** How does legal enforcement collaborate with NGOs and international organisations on THB cases?
- 12** Are there any legal barriers that prevent trafficking survivors from receiving full protection and justice and residence permits?

Prevention

- 1 What steps are taken, if any, in the prevention of THB in the northern part of Cyprus?
- 2 Are there measures taken to inform possible victims of trafficking?
- 3 Are there any actions taken to discourage demand for trafficking?
- 4 Is there a debate about changing employment legal text for foreigners that will allow foreign workers to change employers, making the work environment less conducive to trafficking?

Institutional and Political Challenges

- 1 What are the main institutional gaps in Cyprus' response to trafficking?
- 2 What role does political will play in anti-trafficking efforts?
- 3 How does bi-communal cooperation (or lack thereof) affect anti-trafficking responses?
- 4 Have you engaged with the Bicommunal Technical Committee on Crime? If so, what has been their response to trafficking-related concerns?

Recommendations

- 1 What changes would you recommend improving the anti-trafficking framework in the northern part?
- 2 Are there best practices from other countries or regions that could be adapted?
- 3 What structural or policy adaptations could be made to enhance cross-community collaboration? Or name 3 priorities for next steps in this regard.
- 4 Is there anything else you would like to add that we haven't covered?





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