

STATEMENT

SPECIALISED ANTI-TRAFFICKING NGOS CALL FOR EFFECTIVE NATIONAL REFERRAL MECHANISMS AND FOCAL POINTS TO SAFEGUARD VICTIMS' RIGHTS

La Strada International

By 15 July, EU Member States must transpose the [revised EU Anti-Trafficking Directive](#) (2024) into national law. [Articles 11](#)(4) and 11(5) require the establishment of National Referral Mechanisms (NRMs) and to formalise these by laws, regulations or administrative provisions, next to the appointment of a national focal point for cross-border victim referrals. Hereto, states should establish minimum standards for the detection, early identification, and assistance to (presumed) victims, in cooperation with relevant support organisations. Article 11(3) further provides that assistance and support must **not** be conditional on a victim's willingness to cooperate in criminal proceedings.

With the transposing deadline approaching, La Strada International is calling for close involvement of CSOs, especially specialised anti-trafficking NGOs including its' members, in the strengthening, implementing, coordination and monitoring of NRMs and focal points, towards adequate protection and support for all victims of human trafficking.

Cooperation with Civil Society

[Article 11](#) of the amended Directive recognises cooperation with civil society organisations (CSOs) as essential to the effective functioning of NRMs and national focal points. Recital 15 requires Member States to identify relevant stakeholders including CSOs and define their roles, responsibilities and communication procedures, while Article 20 calls for broader coordination with CSOs. Together, these provisions underline the central role of CSOs in preventing human trafficking and supporting victims.

Many EU Member States already have structured cooperation with specialised anti-trafficking NGOs, including La Strada International members, who have contributed to the development, implementation, monitoring and, in some cases, coordination of NRMs. Over the past two years of transposing the Directive, members have actively participated in consultations to – where applicable - strengthen and formalise NRMs and establish national focal points.

La Strada International commends this cooperation and the recognition of our expertise. NGOs are often entrusted with key functions, including information provision, specialised accommodation, psychosocial counselling, legal assistance, long-term reintegration support, outreach, detection and referrals. They also play an important role in cross-border referrals, which remain largely organised on a bilateral basis. These NGO-led referral pathways, including transnational CSO networks, should be recognised, strengthened and preserved.

However, cooperation with specialised anti-trafficking NGOs is not always formally embedded in legislation or policy and often relies on project-based funding or informal arrangements, undermining sustainability and continuity, particularly in the context of current resource constraints. It is therefore essential that anti-trafficking NGOs are formally integrated into NRMs and national focal points as key stakeholders with clearly defined roles and responsibilities, and recognised as permanent strategic partners rather than on an ad hoc or purely service-delivery basis.

CSOs' role in the detection and identification of victims

Victims of human trafficking rarely self-identify and often avoid contact with authorities due to fear, trauma, mistrust or a lack of awareness of their rights. Early detection and identification - and effective NRMs require a proactive, multidisciplinary approach that goes beyond law enforcement and fully integrates specialised anti-trafficking NGOs into identification and referral systems.

Specialised NGOs are often the first point of contact for (potential) victims, particularly those not identified by law enforcement or border authorities. Hence, they should be able to refer presumed victims to the relevant authorities and support services, with their assessments given due weight in identification procedures. Member States should therefore formally recognise specialised anti-trafficking NGOs as frontline actors alongside labour inspectorates, asylum and border authorities, and social and welfare services, and institutionalise their role within formal referral and identification frameworks.

Where cooperation with NGOs remains informal, project-based or dependent on individual contacts, systems are less effective, while trust in NGOs - particularly in outreach settings, shelters and migrant support services - also increases the likelihood of victim identification. Continued reliance on police-led identification models limits proactive detection in labour, social, health and migration contexts.

Member States should also engage workers' rights organisations and trade unions, which are well placed to detect victims, facilitate referrals to specialised support services, and act as trusted third-party reporters or first responders. As the Directive applies to all forms of trafficking, including now the exploitation of surrogacy, forced marriage and illegal adoption, Member States should also involve organisations with expertise in identifying and referring victims of these forms of exploitation.

Victim-centred identification and referral

To ensure early identification and effective referral to protection and support, NRMs must provide safe, confidential and non-punitive reporting mechanisms. Victims, including vulnerable foreign nationals with an insecure residence status or in informal employment, must be able to come forward without fear of detention, sanctions or adverse immigration consequences.

Identification procedures should be grounded in a victim-centred, human rights-based approach that prioritises gender- and child-sensitive practices, trust and access to support, regardless of cooperation with criminal proceedings.

While standards of immediate protection have improved, unconditional access to assistance remains very limited in practice, the same for access to residence on personal or humanitarian grounds. Access to identification, protection and assistance must be based on individual needs and indicators of exploitation, and not on cooperation with law enforcement. A clear separation between support and criminal justice objectives is therefore essential.

Finally, mutual recognition of victim status across EU Member States should be introduced so that individuals recognised as victims in one Member State are recognised as such throughout the EU.

Effective National Focal Points

Cross-border cooperation should focus on ensuring the safe referral and effective assistance of victims across jurisdictions. As recognised by the Directive, national focal points for cross-border referrals should not function as helplines or as direct points of contact for victims. Rather, their primary function should be to coordinate and facilitate structured communication and cross-border referrals between national systems in order to ensure continuity of protection and assistance across jurisdictions. CSOs engaged in the referral of victims across borders, could be designated as competent actors to be involved in the coordinator or implementation of focal points.

Focal points should serve as coordination mechanisms rather than enforcement or return actors. They should build on, and not displace, existing NGO-led and multidisciplinary referral pathways. Experience shows that cross-border referrals often rely on trusted bilateral and civil society channels, which are vital for preserving victims' trust and ensuring seamless support, and should be built on an adequate assessment of their care needs and safety.

Focal points and NRMs should be designed with the objective of enabling effective cross-border cooperation. Across the EU, common standards, compatible mandates, and clear procedures for cross-border referrals are essential to ensure continuity of protection for victims and to support efficient cooperation between Member States.

Clear operational procedures and training for all relevant stakeholders

The operation of NRMs and national focal points should be underpinned by clearly defined responsibilities, procedures, and lines of communication, rather than merely reflecting existing practice without addressing identified gaps in victim protection. Effective NRMs and national focal points therefore require not only mapping the status quo and formalising procedures, but also establishing clear obligations to address weaknesses in protection systems, ensuring legal certainty and access to assistance.

As effectiveness depends on well-trained practitioners and trust-based cooperation between actors, it is essential that all stakeholders involved in identification and referral - including NGOs - are informed of their responsibilities, procedures and communication lines, and receive regular updates within a structured and comprehensive training framework. In this context, NGOs play a key role as stakeholders through training, consultation, awareness-raising, and the development of guidance and procedures.

Monitoring the effectiveness and impact of NRMs and national focal points

The effectiveness of NRMs and focal points depends not only on their formal establishment but also on the consistent implementation of each stage of the referral process. Monitoring should therefore assess both compliance with procedures and their practical impact, with particular attention to outcomes for victims of human trafficking.

Although substantial data are collected on trafficking offences, victims and offenders, less attention is given to evaluating the functioning of NRMs and focal points themselves. This limits understanding of how referral mechanisms operate in practice and whether they ensure timely, rights-based access to protection and support.

Monitoring should assess whether coordination and referral procedures are applied consistently across sectors and regions, whether minimum standards for detection and identification are met, and whether support measures deliver meaningful outcomes for victims beyond procedural compliance. While the revised EU Anti-Trafficking Directive makes the appointment of National Rapporteurs optional, Member States are strongly encouraged to designate independent National Rapporteurs to ensure effective and impartial monitoring, in cooperation with civil society organisations and with robust safeguards for data protection and confidentiality.

Sustainable and adequate funding

Effective NRMs, national focal points and related services depend on sustainable and adequate funding, including for civil society organisations. Current short-term, fragmented or insufficient funding undermines continuity of care, limits capacity and weakens anti-trafficking responses.

Member States and the European Commission should therefore ensure predictable, multi-annual core funding for NGOs engaged in anti-trafficking work, including those with coordination roles within NRMs. Such funding is essential to the functioning of victim-centred systems and to maintaining the trust on which identification and assistance depend.

To remain effective, NRMs and national focal points must function continuously through political transitions, emergencies, large-scale displacement, natural disasters and public health crises, and respond to new trends and evolving forms of exploitation.

CALL TO ACTION

Without meaningful civil society involvement, formal NRMs and national focal points risk failing to effectively protect and support trafficking victims. La Strada International calls on the European Commission and Member States to ensure the revised EU Anti-Trafficking Directive delivers effective NRMs and focal points through structured cooperation with civil society.

In particular we demand States to:

- 1. Ensure formal CSO inclusion in the strengthening, implementing, coordination and monitoring of NRMs and national focal points**, by defining specific roles and responsibilities for anti-trafficking NGOs, next to trade unions, workers' organisations and other CSOs.
- 2. Formally recognise specialised anti-trafficking NGOs as frontline actors in victim detection, identification, and referral** alongside public authorities, ensuring their assessments carry appropriate weight, including in cross-border cases.
- 3. Ensure NRMs and focal points address gaps in identification, referral, and support, remain operational through political transitions and crises**, and adapt to evolving forms of exploitation.
- 4. Establish safe, confidential, non-punitive reporting and referral mechanisms for all victims regardless of status.**
- 5. Offer unconditional support to victims of trafficking**, by creating a "social pathway" independent of cooperation in criminal proceedings.

6. **Strengthen cross-border referral systems by building on existing NGO-led and multidisciplinary pathways**, ensuring trust-based, victim-centred cooperation.
7. **Harmonize focal points' mandates across the EU, to ensure effective cross border victim protection and introduce mutual recognition of victim status across EU Member States.**
8. **Make training on NRMs and referral procedures mandatory and regular for all stakeholders**, including CSOs.
9. **Ensure sustainable, long-term funding for NRMs and national focal points**, including adequate support for CSOs, beyond project-based funding.
10. **Conduct regular independent evaluations of NRMs and focal points**, led or mandated by independent National Rapporteurs, focusing on impact on victim protection and rights.