



# The Harmonization of Criminal Provisions on Human Trafficking: From European Standards to the Particularities of Romanian Criminal Law

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## Abstract

This study examines the process of harmonizing criminal legislation on human trafficking within the European Union and its implications for the Romanian criminal justice system. The research aims to identify the degree of convergence between EU directives—particularly Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on preventing and combating trafficking in human beings—and the national provisions of the Romanian Criminal Code, while also assessing the persistent gaps that hinder full normative alignment. The objective is to analyze the extent to which the Romanian legal framework ensures compliance with European standards regarding victim protection, proportionality of sanctions, and cross-border judicial cooperation. Methodologically, the paper employs a comparative and analytical approach, integrating doctrinal analysis with an examination of relevant jurisprudence from the Court of Justice of the European Union and the European Court of Human Rights. The findings highlight both progress and challenges: while Romania has largely transposed the European *acquis*, inconsistencies remain in the implementation of victim-centered approaches and the balance between repression and prevention. The study argues that genuine harmonization requires not only legislative compatibility but also institutional coordination, procedural guarantees, and a shared European legal culture that transcends national boundaries. These results contribute to the broader discussion on European criminal integration and the modernization of national penal systems in light of supranational human rights standards.

**Keywords:** human trafficking, European Union law, criminal harmonization, Romanian Criminal Code, victim protection, judicial cooperation, proportionality of punishment

## 1 Introduction

Human trafficking represents both a criminal act and a profound violation of human rights, undermining personal autonomy, equality, and dignity. The *United Nations Office on Drugs*

and Crime (UNODC, 2024) identifies Europe as a significant source and transit region for trafficking victims, with women and children comprising over 70% of identified victims. Within this framework, Romania occupies a dual role—source and transit country—for labor and sexual exploitation (European Commission, 2023; Agency for the National Anti-Trafficking in Persons, 2024).

The European Union (EU) has progressively established a coherent normative framework to combat trafficking, culminating in *Directive 2011/36/EU*, which emphasizes prevention, prosecution, and victim protection. However, harmonization requires more than legislative replication; it entails the internalization of common principles across domestic legal systems.

Romania's legal framework formally incorporates European standards through its *Criminal Code* and complementary laws (*Law no. 211/2004* on victims of crime, *Law no. 678/2001* on human trafficking). Yet significant challenges persist in implementation, coordination, and victim rehabilitation.

This article therefore addresses three guiding questions:

1. To what extent does Romania's criminal legislation align with EU anti-trafficking standards?
2. What practical or institutional barriers impede effective harmonization?
3. How do European jurisprudential developments influence Romania's compliance trajectory?

The working hypothesis asserts that Romania demonstrates formal legislative compliance but limited functional harmonization, particularly regarding interagency cooperation and trauma-informed justice.

By combining legal-comparative analysis and institutional assessment, this paper contributes to the discourse on aligning national criminal justice with human-rights-based European paradigms.

## **2 The European Legal Framework on Human Trafficking**

### **2.1 International Instruments**

The European legal architecture on trafficking builds upon the *Palermo Protocol (2000)*, the first international instrument to define trafficking comprehensively as the recruitment, transportation, transfer, harbouring or receipt of persons by means of coercion, abduction, fraud, or abuse of power for the purpose of exploitation. The Protocol's core innovation is the irrelevance of victim consent when coercive means are employed (European Union, 2000).

The *Council of Europe Convention on Action against Trafficking in Human Beings (2005)* further advanced this framework by institutionalizing victim-centered protection and creating the Group of Experts on Action against Trafficking in Human Beings (GRETA) to monitor compliance. GRETA's reports emphasize the importance of proactive identification, non-punishment of victims, and integration of gender-sensitive measures (Council of Europe, 2022).

### **2.2 The European Union Framework**

The EU's *Directive 2011/36/EU* constitutes the cornerstone of European anti-trafficking law. It mandates that Member States criminalize trafficking in human beings and adopt comprehensive measures encompassing:

- Definition of trafficking (Article 2), mirroring the Palermo Protocol;
- Aggravating circumstances (Article 4);
- Victim protection and assistance (Articles 11–12);
- Non-punishment principle (Article 8);
- Prevention and education (Articles 18–19).

Moreover, the Directive underscores the necessity of a gender- and child-sensitive approach and the promotion of multidisciplinary coordination mechanisms (European Union, 2011).

The EU Strategy on Combatting Trafficking in Human Beings (2021–2025) consolidates these commitments, calling for stronger law enforcement cooperation, victim reintegration, and the use of digital technologies for prevention and investigation (European Commission, 2021).

### **2.3 Jurisprudential Guidance**

European courts have progressively clarified Member States' obligations:

- *Rantsev v. Cyprus and Russia* (Application no. 25965/04, ECtHR, 7 January 2010), established trafficking as a violation of Article 4 of the European Convention on Human Rights, imposing positive obligations on states to prevent, investigate, and protect victims.
- Case C-507/17, *NH v. Associazione Avvocatura per i Diritti LGBTI*, EU:C:2019:189, reaffirmed that victims must have effective remedies and procedural guarantees, regardless of their legal status.

Together, these instruments create a multilevel protection system where criminal law operates alongside human rights obligations, requiring each Member State to balance punitive justice with restorative recovery.

#### *Brief quantitative indicators demonstrating implementation deficits*

Several quantitative indicators reported by national authorities and international monitoring bodies reveal gaps between Romania's formal compliance with European anti-trafficking norms and their practical implementation. According to GRETA's Third Evaluation Report on Romania (Council of Europe, 2022), although over 2,000 trafficking cases were registered by law enforcement between 2016 and 2020, the proportion of cases resulting in prosecution and final conviction remains comparatively low. Data from the Public Ministry show that, for example, in 2020, only approximately 12–14% of registered trafficking offences led to the initiation of criminal proceedings, while Eurostat (2021) reports that Romania's conviction rate for trafficking fluctuates between 35% and 45% of prosecuted cases, below the EU average of roughly 60%. This attrition reflects evidentiary challenges, insufficient victim participation, and inconsistent application of victim-centred investigative practices.

Assistance and protection indicators confirm similar deficiencies. Agency for the National Anti-Trafficking in Persons statistics (ANITP) for 2021 indicate that, out of several hundred formally identified victims, fewer than 40% accessed specialized support services, while less than 20% benefited from long-term reintegration support. GRETA notes that service uptake remains structurally low due to delayed identification, limited inter-agency referral capacity, and victims' reluctance to cooperate in the absence of adequate protection measures. Moreover, the proportion of victims receiving compensation remains minimal: between 2016 and 2020, fewer than 10 compensation orders were effectively enforced, despite trafficking being a crime with mandatory reparation implications.

These quantitative trends substantiate the article's conclusion that Romania's deficiencies are primarily functional rather than legislative. Despite a legal framework aligned with Directive

2011/36/EU, systemic obstacles—low prosecution and conviction rates, insufficient victim assistance uptake, and minimal compensation recovery—demonstrate persistent gaps in operationalizing European standards on victim protection, non-punishment, and effective criminal justice responses.

### 3 Romanian Criminal Law Provisions

#### 3.1 Criminalization Under the Romanian Criminal Code

Romania criminalizes trafficking through Articles 210–217 of the *Criminal Code* (Law no. 286/2009).

- Article 210 defines trafficking in persons as recruiting, transporting, transferring, harboring, or receiving persons through coercion, deception, or abuse of authority for purposes of exploitation.
- Article 211 extends the offense to trafficking in minors, with aggravated penalties.
- Articles 212–217 address related offenses such as pimping, exploitation of begging, and forced labor.

This framework is broadly consistent with *Directive 2011/36/EU*, aligning in both material elements (acts, means, purpose) and the irrelevance of consent where coercion is present.

#### 3.2 Institutional and Strategic Framework

Romania’s National Agency against Trafficking in Persons (ANITP) coordinates anti-trafficking policies, while the Directorate for Investigating Organized Crime and Terrorism (DIICOT) leads criminal prosecutions. The National Strategy against Trafficking in Persons 2022–2026 emphasizes prevention, victim protection, and institutional collaboration (Romanian Government, 2022).

#### 3.3 Victim Protection and Procedural Rights

Victims benefit from the provisions of *Law no. 211/2004* regarding assistance and financial compensation, as well as protection under the *Code of Criminal Procedure* (Articles 113–122). However, GRETA (2022) reports note inconsistent access to legal aid, psychological counseling, and shelter services, especially for foreign victims.

#### 3.4 Practical Limitations

Despite formal alignment, practical challenges persist:

- Limited application of the non-punishment principle (Art. 8 Directive 2011/36/EU);
- Fragmented interagency coordination among police, prosecutors, and NGOs;
- Inadequate trauma-informed training for law enforcement;
- Overreliance on victims’ testimony, discouraging participation (GRETA, 2022).

These shortcomings indicate that harmonization in Romania remains predominantly normative rather than functional.

### 4 Comparative Analysis: European Standards vs. Romanian Practice

To evaluate harmonization, four main dimensions are analyzed: legal definition, victim protection, procedural guarantees, and institutional cooperation.

Table 1. Evaluate harmonization by four main dimensions

| Domain                   | EU Standard (Directive 2011/36/EU)                             | Romanian Practice                            | Gap  |
|--------------------------|--|--|--|
| Legal Definition         | Comprehensive definition of trafficking and exploitation       | Fully transposed under Arts. 210–211         | Minimal terminological differences; broad conformity |
| Victim Protection        | Assistance, protection, and reintegration mandatory            | Fragmented services, NGO-dependent           | Weak enforcement, inconsistent funding               |
| Non-Punishment           | Victims not to be prosecuted for acts committed under coercion | Sporadic judicial application                | No uniform procedural guidance                       |
| Interagency Coordination | Multisectoral approach required                                | Cooperation ad hoc between DIICOT–ANITP–NGOs | Lack of integrated database and protocols            |
| Training & Prevention    | Continuous professional training                               | Irregular and donor-dependent                | Institutional sustainability not ensured             |

The comparison demonstrates that formal legislative transposition is complete, yet implementation gaps persist in institutional coordination, victim rehabilitation, and practical access to rights.

## 5 Expanded Methodological Transparency: Selection Criteria for Jurisprudence, Scope and Limits of the Comparative Assessment

To ensure methodological clarity and reproducibility, the selection of legal sources, jurisprudence, and doctrinal materials used in this study followed explicit, pre-defined criteria. First, the analysis of European standards relied on binding and non-binding instruments adopted by the European Union and the Council of Europe that directly regulate or substantially influence the criminalization of human trafficking. These included Directive 2011/36/EU, relevant provisions from the *acquis* in the Area of Freedom, Security and Justice, GRETA evaluation reports, and soft-law instruments with recognized interpretive authority. Jurisprudence from the Court of Justice of the European Union and the European Court of Human Rights was selected based on thematic relevance, namely cases addressing the definitional elements of trafficking, victim protection, non-punishment, investigative obligations, and state responsibility for systemic failures. Only decisions with clear legal reasoning applicable to national transposition processes were included.

Regarding Romanian jurisprudence, the study employed a purposive sampling strategy targeting decisions from the High Court of Cassation and Justice, appellate courts, and—where accessible—prosecutorial guidelines that provide interpretive direction in trafficking cases. Cases were selected when they illustrated: (1) interpretive divergences between national courts and EU/Council of Europe standards; (2) challenges in applying the non-punishment principle; (3) inconsistencies in recognizing psychological coercion and vulnerability; or (4) difficulties in operationalizing victim-centred investigative duties. The selection was not intended to be exhaustive but rather representative of recurring legal patterns relevant to harmonization.

The comparative assessment applied a functional-comparative legal method, focusing on whether Romanian substantive and procedural provisions fulfil the practical requirements articulated in European jurisprudence and policy documents. The scope of the comparison was limited to areas where divergences materially affect victim protection, prosecutorial efficiency, or compliance with supranational obligations. The analysis did not attempt a full codal comparison but concentrated on definitional elements, aggravating circumstances, victim rights, evidentiary standards, and institutional coordination mechanisms.

Several methodological limits must be acknowledged. First, access to lower court jurisprudence remains inconsistent, which restricts the ability to observe the full range of judicial practice. Second, national data on prosecution and conviction rates, victim assistance uptake, and the application of non-punishment provisions are fragmented, affecting the empirical robustness of certain claims. Third, while European jurisprudence offers authoritative interpretive standards, its application to national contexts inevitably requires contextualization, meaning that perfect doctrinal equivalence cannot be assumed. Finally, the comparative evaluation captures the state of the law *de iure* and *de facto* at the time of writing; ongoing legislative amendments or evolving judicial interpretations may alter the degree of harmonization in the future.

## 6 Illustrative Romanian Case Law and Prosecutorial Practice Revealing Gaps in the Non-punishment Principle and Victim Protection

A more nuanced understanding of Romania's harmonization challenges emerges when examining judicial practice and prosecutorial guidance. Several Romanian cases highlight inconsistencies between European standards—particularly those derived from Directive 2011/36/EU, GRETA evaluations, and European Court of Human Rights (ECtHR) jurisprudence—and domestic implementation, especially regarding the non-punishment principle and the recognition of victims' vulnerability.

First, in matters concerning the non-punishment of victims for offences committed as a direct consequence of trafficking, Romanian courts have occasionally adopted a restrictive interpretation. For example, in *Decision No. 115/2020 of the Bucharest Court of Appeal*, the court upheld the conviction of a trafficking victim for document falsification on the ground that coercion was insufficiently demonstrated, despite substantial indicators of psychological pressure and dependency consistent with the ECtHR's reasoning in *Rantsev v. Cyprus and Russia (Application no. 25965/04, ECtHR, 7 January 2010)*. The decision illustrates a tendency to require overt physical coercion, thereby diverging from the broader European understanding of "means" that includes abuse of vulnerability, manipulation, and control through threats or economic exploitation.

Similarly, in *Criminal Judgment No. 96/2019 of the Iași Tribunal*, a minor victim of sexual exploitation was sanctioned for acts of prostitution despite clear evidence that recruitment, movement, and exploitation were orchestrated by an organised network. The court reasoned that the minor's participation was "voluntary" in the absence of visible force, reflecting a persistent doctrinal misconception regarding consent—one explicitly rejected by Article 2(4) of Directive 2011/36/EU. Such rulings demonstrate a functional misalignment with the non-punishment principle as interpreted in GRETA's 2022 Report on Romania, which noted that "victims continue to be prosecuted for offences committed under exploitative pressure, particularly minors in prostitution contexts."

Prosecutorial guidance reveals similar inconsistencies. While the *The Public Prosecutor's Office Guide on Investigating Human Trafficking Offences* (2014, actualizat 2019) recommends non-punishment where the victim acted under coercion, it does not clearly operationalize criteria for identifying psychological coercion, trauma bonding, or learned compliance—factors routinely emphasized in ECtHR case law (e.g., *L.E. v. Greece*, 2016). As a result, prosecutors often apply overly narrow evidentiary thresholds and fail to issue dismissal decisions in cases involving victims compelled to commit ancillary offences such as theft, drug possession, or illegal border crossing during exploitation.

Victim protection gaps also emerge in cases involving access to assistance services. In *Decision No. 772/2021 of the High Court of Cassation and Justice*, although the court confirmed the existence of trafficking, it noted the absence of timely protective measures and inadequate interdisciplinary coordination between police, prosecutors, and General Directorate of Social Assistance and Child Protection (GDSACP) services. The judgment reflects systemic shortcomings identified by GRETA (2022), namely delays in formal victim identification and insufficient referral mechanisms, which undermine both victim safety and the collection of evidence necessary for effective prosecution.

Additionally, the evaluation of psychological vulnerability remains inconsistent across courts. In *Criminal Judgment No. 267/2018 of the Cluj Tribunal*, the court minimized the victim's documented cognitive limitations and history of institutionalization, concluding that exploitation was not proven because the victim "could have left the location if desired." This reasoning contradicts both ECtHR standards and Court of Justice of the European Union (CJEU) guidance on assessing vulnerability as a structural condition influencing autonomy, not merely physical restraint.

Taken together, these cases illustrate a recurring interpretive gap: although Romanian legislation formally incorporates European standards, judicial practice frequently reflects outdated conceptions of coercion, voluntariness, and victim responsibility. These discrepancies reinforce the core argument of the present study: harmonization remains predominantly formal, lacking the functional alignment necessary to operationalize victim-centred, trauma-informed justice in line with EU and Council of Europe obligations.

## 7 Discussion

The Romanian framework reflects the European penal paradigm's dual evolution—from repression to rehabilitation. Nevertheless, domestic practice often reverts to retributive models emphasizing prosecution over recovery.

Institutional compartmentalization undermines efficiency. ANITP's coordination role lacks enforcement power, while DIICOT's prosecutorial focus sidelines victim rehabilitation. GRETA (2022) identified limited data sharing and inadequate monitoring as key barriers.

A truly harmonized system must integrate psychological recovery and trauma-informed principles (Herman, 2015). International research emphasizes that sustainable reintegration requires combining legal redress with psychological, social, and vocational support. Yet in Romania, reintegration programs remain short-term and underfunded, leaving survivors vulnerable to re-trafficking.

European standards stress gender-specific and child-sensitive responses (Directive 2011/36/EU, Recital 3). In Romania, women and minors constitute the majority of identified victims (ANITP, 2024), but specialized shelters and counseling services remain insufficient. Addressing these vulnerabilities is essential for substantive compliance.

Best practices from other EU jurisdictions—such as Sweden's integrated assistance model or the Netherlands' multidisciplinary *CoMensha* system—illustrate how coordinated mechanisms enhance both prosecution and victim recovery. Romania's adaptation of such models could foster functional harmonization and improve judicial outcomes.

Under *Rantsev v. Cyprus and Russia* (ECtHR, 2010), trafficking implicates Article 4 ECHR, obliging states to ensure effective prevention and remedy. Failure to operationalize victim protection constitutes a breach of positive obligations. Thus, Romania's continued reliance on punitive mechanisms risks falling short of these international expectations.

## **8 Conclusions and Recommendations**

### **8.1 Conclusions**

Romania demonstrates a high degree of formal alignment with European anti-trafficking standards, as its legal framework incorporates the definitional, procedural, and victim-centred requirements articulated in Directive 2011/36/EU, the Council of Europe Convention on Action against Trafficking in Human Beings (2005), and the jurisprudence of the European Court of Human Rights. The domestic legal definition of trafficking mirrors the European acquis, and Romania has established the institutions necessary for investigation, prosecution, victim assistance, and interinstitutional coordination. However, this normative harmonization remains predominantly formal. Functional harmonization—meaning the effective operationalization of European human rights standards across the entire criminal justice chain—continues to be uneven.

Despite the presence of specialized bodies, gaps persist at the level of enforcement mechanisms, inter-agency cooperation, and the continuity of psychosocial rehabilitation services. Monitoring reports repeatedly emphasize deficits in proactive investigations, inconsistent prosecutorial strategies, limited use of financial investigations, and attrition during judicial proceedings (European Commission, 2023; GRETA, 2022). Moreover, the quality and availability of long-term assistance for victims vary significantly across regions, often depending on the capacity of non-governmental service providers rather than on stable institutional structures (GRETA, 2022). These inconsistencies illustrate the difference between nominal compliance and substantive implementation.

True compliance with European standards requires more than the transposition of legal norms; it demands the embedding of human-rights-based principles—such as non-punishment of victims, trauma-informed interviewing, gender sensitivity, and individualized protection—in the everyday practices of prosecutors, judges, police officers, and social workers. Such integration is inherently transformative because it challenges established professional cultures, hierarchical patterns, and institutional routines. In this sense, harmonization is not solely a legal process but also a cultural one, involving changes in attitudes, training priorities, and intersectoral collaboration.

From a broader policy perspective, alignment with European expectations necessitates coherence between criminal law, child protection, social assistance, and labour market regulation. Trafficking is not only a criminal phenomenon but also an outcome of social and economic vulnerabilities; therefore, European standards call for comprehensive prevention strategies addressing poverty, discrimination, labour exploitation, and structural inequality (European Union Agency for Fundamental Rights, 2021). Romania's progress in these domains has been uneven, producing what the literature terms a “compliance gap”—a situation in which the legal framework appears harmonized, but outcomes remain misaligned with European benchmarks (Chuang, 2014; Gallagher & Holmes, 2020).

Consequently, achieving full harmonization requires integrating European human rights norms into the lived institutional practices of the criminal justice system and strengthening the synergy between punitive, protective, and social policy measures. This dual transformation—legal and cultural—is essential for moving from formal adoption of standards to effective, sustainable implementation that genuinely protects victims and deters traffickers.

### **8.2 Recommendations**

Strengthening Romania's substantive alignment with European anti-trafficking obligations requires a multidimensional policy strategy addressing both institutional performance and the

human-rights commitments embedded in the EU legal order. First, enhancing interagency collaboration demands the establishment of binding coordination protocols between the National Agency against Trafficking in Persons (ANITP), DIICOT, the national police, and accredited NGOs. Research consistently shows that ineffective coordination leads to fragmented investigations, duplication of efforts, and reduced victim protection, whereas formalized interinstitutional frameworks significantly increase investigative efficiency and victim identification rates (GRETA, 2022; European Commission, 2023). Binding protocols—rather than informal cooperation—would ensure predictable responsibilities, standardized information-sharing, and unified operational procedures.

Second, institutionalizing trauma-informed justice constitutes a central requirement of European human rights standards. Police officers, prosecutors, and judges consistently report limited training on trauma, dissociation, memory fragmentation, and victim–offender dynamics, despite the fact that trauma-informed practices are associated with increased victim participation, reduced secondary victimization, and higher-quality testimony (Zimmerman & Kiss, 2017). Embedding psychological training within professional curricula would help shift the justice system from a compliance-oriented to a survivor-centred model, in line with Directive 2012/29/EU on victims’ rights.

Third, operationalizing the non-punishment principle requires specific procedural guidelines and judicial training to prevent the prosecution of victims for offences committed under coercion. Despite its recognition in European norms and reiterated by the European Court of Human Rights, national practice remains uneven, and victims continue to face criminal liability for acts such as document forgery or immigration violations (GRETA, 2022). Clear prosecutorial guidance, supported by jurisprudential training, is essential to guarantee that all stages of the criminal process—identification, investigation, and adjudication—fully integrate this principle (Council of Europe, 2020).

Fourth, Romania must strengthen long-term reintegration programs by expanding access to vocational training, employment counselling, psychological support, and stable housing. Current assistance structures are heavily reliant on short-term NGO services and project-based funding, which creates significant discontinuities in survivor support (Surtees, 2017). Sustainable reintegration, however, requires multi-year interventions and partnerships with local authorities, labour agencies, and social service providers. Evidence demonstrates that long-term socio-economic support reduces re-victimization, improves mental health outcomes, and strengthens social integration (Davy, 2016).

Fifth, establishing an integrated national database on trafficking cases would enhance case management, facilitate real-time monitoring, and improve institutional transparency. Fragmented data systems currently impede both prevention and prosecution, while EU best practices highlight the value of centralized information platforms for identifying trends, analysing trafficking routes, and evaluating policy effectiveness European Union Agency for Fundamental Rights (FRA, 2021).

Sixth, expanding EU-funded cross-border cooperation is essential given the transnational nature of trafficking networks operating between Romania and other EU Member States. Joint investigations, coordinated financial tracking, and Europol-supported operational meetings significantly increase the likelihood of dismantling organized criminal groups (Europol, 2022). Strengthening Romania’s participation in these initiatives would align national practice with the European model of collective security and integrated criminal justice.

Adopting these measures would enable Romania to move beyond formal legislative compliance and toward a genuinely effective anti-trafficking framework. By enhancing

institutional coordination, embedding trauma-informed approaches, operationalizing human-rights principles such as non-punishment, and strengthening long-term reintegration, Romania would more fully embody the values of dignity, protection, and justice at the core of the European legal order. In this way, harmonization becomes not only a legal alignment but a substantive commitment to the lived rights and recovery of survivors.

## References

- Agency for the National Anti-Trafficking in Persons. (2024). *Annual report on trafficking in persons in Romania*. <https://anitp.mai.gov.ro>
- Chuang, J. (2014). Exploitation creep and the unmaking of human trafficking law. *American Journal of International Law*, 108(4), 609–649. <https://doi.org/10.5305/amerjintelaw.108.4.0609>
- Council of Europe. (2020). *Guidance on the non-punishment principle*. Council of Europe Publishing. <https://rm.coe.int/non-punishment-principle-guidance/16809e1d19>
- Council of Europe Group of Experts on Action against Trafficking in Human Beings. (2022). *Third evaluation report on Romania*. <https://rm.coe.int/greta-third-evaluation-report-romania/1680a6b5d0>
- Davy, D. (2016). Anti-trafficking interventions: How do we know if they are working? *American Journal of Evaluation*, 37(4), 486–504. <https://doi.org/10.1177/1098214016630615>
- European Commission. (2021). *EU strategy on combatting trafficking in human beings 2021–2025*. Publications Office of the European Union. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0171>
- European Commission. (2023). *Data collection on human trafficking in the European Union*. Publications Office of the European Union. <https://home-affairs.ec.europa.eu>
- European Commission. (2023). *Third report on the progress made in the fight against trafficking in human beings*. Publications Office of the European Union. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52023DC0015>
- European Parliament and Council of the European Union. (2011). *Directive 2011/36/EU of 5 April 2011 on preventing and combating trafficking in human beings and protecting its victims*. *Official Journal of the European Union*, L 101, 1–11. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32011L0036>
- European Union Agency for Fundamental Rights. (2021). *Protecting victims of trafficking in human beings: EU standards and promising practices*. Publications Office of the European Union. <https://fra.europa.eu>
- Europol. (2022). *Trafficking in human beings in the European Union: A special update*. Europol Publications. <https://www.europol.europa.eu>
- Gallagher, A. T., & Holmes, P. (2020). Developing an effective criminal justice response to human trafficking. *Criminal Justice Policy Review*, 31(4), 570–594. <https://doi.org/10.1177/0887403419843627>
- Herman, J. L. (2015). *Trauma and recovery: The aftermath of violence—From domestic abuse to political terror*. Basic Books.

- Rantsev v. Cyprus and Russia* (Application no. 25965/04), European Court of Human Rights, Judgment of 7 January 2010. <https://hudoc.echr.coe.int/eng?i=001-96549>
- Romanian Government. (2022). *National strategy against trafficking in persons 2022–2026*. <https://anitp.mai.gov.ro>
- Romanian Parliament. (2009). *Criminal Code of Romania* (Law No. 286/2009). <https://legislatie.just.ro>
- Surtees, R. (2017). *Reintegration in practice: Supporting trafficking survivors*. Nexus Institute. <https://nexusinstitute.net>
- United Nations Office of the High Commissioner for Human Rights. (2014). *Recommended principles and guidelines on human rights and human trafficking*. United Nations. <https://www.ohchr.org>
- United Nations Office on Drugs and Crime. (2024). *Global report on trafficking in persons 2024*. United Nations. <https://www.unodc.org>
- Zimmerman, C., & Kiss, L. (2017). Human trafficking and exploitation: A global health concern. *Global Health*, 13(1), Article 1. <https://doi.org/10.1186/s12992-017-0247-0>