

**HUMAN TRAFFICKING VICTIMS' RIGHTS - FROM
REGULATION TO IMPLEMENTATION. GOOD PRACTICES AND
CHALLENGES**

Abstract:	<p><i>The practice of human trafficking is not only a serious legal and social issue but a major violation of human rights, an attempt to reduce the value of humanity and to treat humans as objects. The National Agency against Trafficking in Person reports describe a tendency of decreased numbers of Romanian victims identified in the last decade by the judicial institutions. The complexity of this criminal phenomenon requires the promotion of a systemic approach and a comprehensive and coordinated involvement of every public institution and authority, nongovernmental organizations, and specialists with competencies in the field of preventing and fighting human trafficking and in providing all forms of assistance services for social reinsertion.</i></p> <p><i>We are analyzing if Romanian law has adequate provisions regarding human trafficking victims' rights, in line with international regulation. We are discussing the good practices and the challenges raised by the implementation of the legal victims' rights, also drawing some suggestions for improving the administrative process of institutional cooperation.</i></p>
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Human trafficking – a human rights violation crime

Human trafficking as a global criminal phenomenon with multiple effects on different societal levels and with traumatic consequences on victims' personalities and life is, first, a serious violation of human rights. This crime violates all articles

of the Universal Declaration of Human Rights¹ because it denies the core of a human being, reducing the value of humanity to that of an object. That's the reason for the numerous traumas the victim is experiencing during and after being trafficked, no matter the extent of violence or coercion suffered during the exploitation. Being reduced to an object is an attack on the core of human identity and leaves unimaginable wounds. Furthermore, the Universal Declaration of Human Rights states unequivocally that "no one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms"².

To fully understand the effects of this crime, we must perceive the subtle nuances of the concepts which describe it, not only from a juridical perspective but also from a sociological and psychological approach, the main objective of this process is the possibility to help these people to regain their life, to be able to function adequately in society and to heal their traumas.

Romanian legal framework versus international regulations

Romanian Criminal Code³ severely punishes human trafficking in article 210 and explicitly describes all the necessary elements to easily identify the crime: "Human trafficking

(1) Recruiting, transporting, transferring, harboring, or receiving a person for the purpose of exploiting him, carried out:

a) by coercion, kidnapping, misleading, or abuse of authority;

b) taking advantage of the impossibility of defending oneself or expressing one's will or of the state of obvious vulnerability of that person;

c) by offering, giving, accepting, or receiving money or other benefits in exchange for the consent of the person who has authority over that person, is punished with imprisonment from 3 to 10 years and the prohibition of the exercise of certain rights.

(2) Trafficking in persons committed by a public official in the exercise of his official duties is punishable by imprisonment from 5 to 12 years.

(3) The consent of the person who is a victim of trafficking does not constitute a valid reason"⁴.

The definition of human trafficking includes three elements⁵. First, the alternative actions sanctioned by law are recruiting, transporting, transferring,

¹ Ratified by United Nations General Assembly Resolution 217A adopted on December 10, 1948, <https://www.un.org/en/about-us/universal-declaration-of-human-rights>, (9.11.2022)

² Article 5, *Universal Declaration of Human Rights*, also article 4 is extremely relevant – "everyone has the right to life, liberty and security of person", <https://www.un.org/en/about-us/universal-declaration-of-human-rights>, (9.11.2022)

³ Law 286/2009, published in Official Gazette No. 510 of July 24, 2009

⁴ Article 210, Romanian Criminal Code, <https://legislatie.just.ro/Public/DetaliiDocumentAfis/223635>, (9.11.2022)

⁵ F. Ambagtsheer, W. Weimar (Eds.) *Trafficking in Human Beings for the Purpose of Organ Removal: Results and Recommendation*, Pabst Science Publishers, Lengerich, 2015, p. 18

harboring, or receiving a person. Secondly, human trafficking is described by a specific means by which that action is achieved: by "coercion, kidnapping, misleading or abuse of authority, and the giving or receiving of payments or benefits to achieve the consent of a person having control over another person"¹. Then, the third condition for the crime judicial investigation is the purpose of these actions - exploitation, which also must be undoubtedly proved. If the purpose cannot be proved, the prosecutor will indict another crime.

These provisions are in line with EU Directive 36/2011² which was implemented in Romanian legislation. The EU Directive also states the "assistance and support for victims of trafficking in human beings"³ and the "protection of victims of trafficking in human beings in criminal investigation and proceedings"⁴. According to the EU Directive provisions, Member States have to take into consideration these provisions and to draw legislation, public policies and mechanisms regarding the "assistance and support provided to victims before, during and for an appropriate period of time after the conclusion of criminal proceedings, assistance and support provided as soon as the competent authorities have a reasonable-grounds indication for believing that the person might be a victim"⁵. Also, the assistance and support measures "shall be provided on a consensual and informed basis and shall include at least standards of living capable of ensuring victims' subsistence through measures such as the provision of appropriate and safe accommodation and material assistance, as well as necessary medical treatment including psychological assistance, counseling and information, and translation and interpretation services where appropriate"⁶. All forms of assistance must be provided unconditionally. In that regard, for avoiding any pressure on the victim to participate in the investigation, there is a reflection period also seen as a recovery time stated within the law. The authorities have to "take the necessary measures to establish appropriate mechanisms aimed at the early identification of, assistance to and support for victims, in cooperation with relevant support organizations"⁷ and "attend to victims with special needs, where those needs derive, in particular, from whether they are pregnant, their health, a disability, a mental or psychological disorder they have, or a serious form of psychological, physical or sexual violence they have suffered"⁸.

¹ Article 210, Romanian Criminal Code,

<https://legislatie.just.ro/Public/DetaliiDocumentAfis/223635>, (09.11.2022)

² *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 protecting its victims, and replacing Council Framework Decision 2002/629/JHA, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32011L0036>, (09.11.2022)

³ *Ibidem*, Article 11

⁴ *Ibidem*, Article 12

⁵ *Ibidem*, Article 11, paragraph 2

⁶ *Ibidem*, Article 11, paragraph 5

⁷ *Ibidem*, Article 11, paragraph 4

⁸ *Ibidem*, Article 11, paragraph 7

Romanian regulations on human trafficking prevention, investigation, and victims' assistance comply also Council of Europe Convention on Action against Trafficking in Human Beings¹ which was adopted by the Committee of Ministers of the Council of Europe on 3 May 2005 and focuses on human rights perspective and on victim protection. It defines trafficking in human beings as "a violation of human rights and an offence to the dignity and integrity of the human being"². The Convention sets mechanisms for supervising the implementation of the obligations contained in it: the Group of Experts on Action against Trafficking in Human Beings (GRETA) and the Committee of the Parties.

The Romanian legal framework for the legislation and regulations relevant to fighting trafficking in persons is extensive and comprehensive and covers not only the preventive measures or the criminal provision regarding the procedure of human trafficking investigations, but also the assistance and support provided to the victims, as stated in National Strategy Against Trafficking in Persons 2018-2022³.

The complexity of the legal framework articulates the action of various institution which have a crucial role in identifying human trafficking victims, investigating the crime, and assisting the victims. It also regulates the mechanisms of inter-institutional cooperation between public institutions and non-governmental organizations.

Implementing the adequate legal framework – a systemic approach

The legal framework and the implementation process and the possible gaps between the two processes are being monitored by The Group of Experts on Action against Trafficking in Human Beings (GRETA)⁴. The experts are implementing a procedure divided into rounds. GRETA selects the specific aspects of the Convention that constitute the object of the evaluation procedure at the start of each round⁵.

Based on National Agency against Trafficking in Persons reports, over 50% of the Romanian identified victims are exploited within the country. The rest of the victims are being exploited abroad, the reducing of the demand for human trafficking services being also addressed by legislative actions, in Romania as well.

¹ *Council of Europe Convention on Action against Trafficking in Human Beings*, signed by Romania on 16/05/2005, ratified on 21/08/2006 01/02/2008 and entering into force on 01.02.2008, <https://www.coe.int/en/web/conventions/full-list?module=treaty-detail&treatynum=197>, (9.11.2022)

² *Idem*

³ A comprehensive list of laws and regulations can be found in *National Strategy Against Trafficking in Persons 2018-2022*, approved by Government Decision no 861/2018, p.13, <https://anitp.mai.gov.ro/en/SNITP%202018-2022.pdf>, (9.11.2022)

⁴ Based on the provisions of the Council of Europe Convention on Action against Trafficking in Human Beings ("Convention"), GRETA is responsible for monitoring the implementation of the Convention and for evaluating the measures taken by each party

⁵ Article 38, paragraph 1 of the Convention, <https://rm.coe.int/168008371d>, (9.11.2022)

The general trend in human trafficking reports shows a decrease of the victims' number. In 2021 GRETA's most recent report¹ which analyse the information from 2016 to 2019, there is mentioned a total number of 2 613 victims. If we add to this report the victims identified in 2020 (596 victims), 2021 (505 victims), and the first semester of 2022 (180 victims), based on National Agency against Trafficking in Person reports², as national rapporteur on human trafficking, we can conclude that from 2016 to the present moment 3894 victims were exploited within the country or abroad.

All forms of exploitation are identified within the victims' group, but the most frequent form is sexual exploitation (almost 80%), and almost 50% of the victims are minors. The so-called "lover-boy method" seems to be the most used method for recruiting victims, especially the women who are exploited by being forced to practice prostitution. Regarding forced labor exploitation, the main recruiting method is by misleading job offers, the recruiting process being put in place through direct contact, using the victims' social circle. Most of the victims have a low level of education which makes them extremely vulnerable. Additionally, many of the victims that have been identified are from rural areas³.

The major risk factors within the recruiting process are low living and education environment, violent background, lack of integration of the family in the community and involvement from the family in education and supporting the children, limited access to middle-level and superior education, lack of attention and sensitiveness offered to the children, school abandon, the lack of support network, especially in rural areas. According to experts⁴, low and limited financial possibilities represented a triggering factor for many victims recruited for any form of exploitation, and poverty undermines any resistance the victim might have against leaving their life environment.

As the United Nation studies show, we also must address the demand for human trafficking victims' services, in order to reduce the corresponding supply of trafficked persons. The reports state that socio-economic information should ideally include an analysis of "how the demand factors affect trafficking markets."⁵ United Nations recommendations emphasize that "states and intergovernmental organizations should also take into account the factors that increase vulnerability to trafficking, including inequality, poverty and all forms of

¹ GRETA Evaluation Report Romania, Third Round, p.4, <https://rm.coe.int/evaluation-report-on-the-implementation-of-the-council-of-europe-conve/1680a2b0f8>, (9.11.2022)

² National Agency against Trafficking in Persons annual reports, <https://anitp.mai.gov.ro/subiectele/cercetare/analize/>, (9.11.2022)

³ *Idem*

⁴ Tamaş Ana Maria, Gavril Ioana Genţiana, *Trafficking in children in Romania: a study on the recruiting process*, Alpha MDN, Buzau, 2009, p.87

⁵ *Toolkit to Combat Trafficking in Persons Global Program against Trafficking in Human Beings*, United Nations publication, p.4, https://www.unodc.org/documents/human-trafficking/Toolkit-files/07-89375_Ebook%5B1%5D.pdf, (9.11.2022)

discrimination and prejudice”¹. Also, Principle 4 of the Recommended Principles and Guidelines on Human Rights and Human Trafficking developed by the United Nations High Commissioner for Human Rights states: “Strategies aimed at preventing trafficking shall address demand as a root cause of trafficking”².

The complexity of this criminal phenomenon requires the promotion of a systemic approach and a comprehensive and coordinated involvement of every public institution and authority, NGOs, and representative of the civil society with competencies in preventing and combating human trafficking and also in assisting the victims for social reinsertion³.

The National Agency against Trafficking in Persons, as the national rapporteur on trafficking in persons, maintains its role to nationally monitor both trafficking in persons and the assistance provided to victims of trafficking with a view to achieving the objectives set forth in the national plan for the implementation of the National Strategy against Trafficking in Persons 2018-2022. Chapter II of Law 678/2001 on preventing and combating trafficking in persons stipulates that: “In order to efficiently combat trafficking in human beings, the public authority and institutions listed in this Chapter, the non-governmental organizations (NGOs) and other representatives of the civil society shall develop, independently or in conjunction, as the case may be, constant activities aimed at preventing trafficking in human beings”⁴.

All the factors involved in fighting trafficking in persons (legal framework, inter-institutional cooperation) are contributing to the descending trend in the national reports⁵. Still, the emerging vulnerable situation on Romanian borders regarding the Ukrainian refugees crises demanded an prompt answer of all the actors involved in prevention, investigation and victims’ assistance, based also on the Recommendations of the OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings (SR/CTHB) on the need to enhance anti-trafficking prevention amid mass migration flows: “to monitor locations known for high risks of human trafficking, including those related to provision of sexual services—including online—street begging and informal sectors of economy, to step up labour inspections to exercise state control over high-risk business sectors, including the travel and hospitality, cleaning, domestic care, construction,

¹ *Ibidem*, p 420

² *Ibidem*, p 458

³ National Agency against Trafficking in Persons, *Conducting prevention campaigns in the field of trafficking in human beings – Practical Guidebook*, București, 2009, p.16

⁴ Article 3, Law 678/2001 on preventing and combating trafficking in persons, published in Official Gazette no. 783 of December 11, 2001, <https://www.legal-tools.org/doc/75a7aa/pdf/>, (9.11.2022)

⁵ National Agency against Trafficking in Persons, *Annual Reports*, <https://anitp.mai.gov.ro/subiectele/cercetare/analize/>, <https://anitp.mai.gov.ro/subiectele/cercetare/analize/>, (9.11.2022)

agriculture (harvesting), meat and other processing industries known to pose increased risks of trafficking in human beings for sexual and labour exploitation”¹.

At the recommendation of the OSCE Special Representative, “all relevant stakeholders at national and local levels should remain attentive to dynamic patterns of large flows of people and the constantly changing tactics employed by traffickers and should rapidly exchange information to adjust their responses accordingly”².

Victims` rights and assistance - public policies, good practices, and challenges

To implement the coordinated public policy for preventing, combating human trafficking and for assisting the victims, many organizations, governmental and non-governmental, must follow the objectives and the actions of the national plan based on the national strategy against trafficking in persons. Each of these organizations have their own duties drawn by the law, intervention in human trafficking prevention actions or assisting the victims being only one of many tasks they must accomplish. That is the reason for the integrative work the Inter-ministerial Working Group which aims to facilitate the inter/institutional cooperation, including civil society. The Group`s activity is supported by the *local anti-trafficking teams*, coordinated by the county rapporteur³.

The mechanisms of cooperation between all organizations with responsibilities in the field of fighting trafficking in persons (prevention, investigation) and in assistance services for victims is regulated by minister`s order - National Identification and Referral Mechanism of Victims of Trafficking in Persons being signed by all the public institutions with a specific role in this area. National Agency against Trafficking in Persons has a central role in monitoring the action of all organization, in preventing victimization and coordination of assistance services provided to victims. National Identification and Referral Mechanism of Victims of Trafficking in Persons follows the good practices established by National Referral Mechanism Handbook OSCE⁴.

The main public policies documents which contain specific measures are National Strategy against Trafficking in Persons and the 2021-2022 National Action Plan for the implementation the Strategy. The National Strategy's Action Plan for Implementation focuses on objectives regarding strengthening and varying

¹ *Recommendations of the OSCE Special Representative and Coordinator for Combating Trafficking in Human Beings (SR/CTHB) on the need to enhance anti-trafficking prevention amid mass migration flows*, <https://www.osce.org/files/f/documents/9/f/513784.pdf>, (9.11.2022)

² *Idem*

³ *Transnational study on the characteristics of policies in the field of trafficking in human beings for labor exploitation 2009-2011*, JLS/2009/ISEC/AG/207, National Agency Against Trafficking in Persons, București, 2011, p.12

⁴ *National Referral Mechanism Handbook OSCE*, <https://anitp.mai.gov.ro/ro/docs/Publicatii%20internationale/510551%20National%20Referral%20Mechanism%20Handbook%20OSCE.%2024%2001%202022.pdf>, (9.11.2022)

the approaches taken to stop human trafficking and lowering the risk variables that contribute to victimization, protection, support, and reintegration of human trafficking victims, improvement of investigative capabilities for this crime, drawing analysis about the dynamic of the phenomenon and facilitating cooperation in the fight against human trafficking and the support of victims¹. There are indicators that can be used to evaluate the degree of implementation for each aim. Based on the analysis of the previous strategies and plan regarding the difficulties in implementing all the measures for victims' assistance, the new strategy considered these issues and draw some measures to overcome the difficulties².

Some of the challenges in implementing the previous national strategy are considered by the current strategy. As mentioned, some of the institutions involved in this fight on different levels have many different and specific roles regarding their legal duties, those related to human trafficking are often considered marginal. Also, assistance to victims of human trafficking is frequently not given the proper attention, and the organization is overwhelmed by other cases of vulnerable persons. Even if the specialized services for human trafficking victims are regulated within the law, there are only a few of them at the national level. This represents a gap in the design of the coordinated national inter-ministerial network, with serious consequences for the reintegration and healing of the victims³. Also, there is a need for increased financial support for this specific area. We are suggesting the approval of an emergency fund for the human trafficking victims' needs, often needed just after and from the moment of identification to the process of family reintegration, in many cases.

As described in GRETA's⁴ first report, Romania has adequate regulations for the protection and assistance of victims (Law No. 678/2001, Law No. 292/2011). So, the provisions of the law are clear and suitable for victims, the gap is being observed in the implementation since there is no punishment stated within the law for not following its provision. For instance, article 63 of Law No. 292/2011 on Social Assistance describes the social services for victims of human trafficking: "a) residential centers with fixed-term accommodation that provide assistance, care, and protection; b) day centers that mainly provide information, counseling, emotional and social support for the purpose of rehabilitation and social reintegration; c) services provided in the community consisting of social

¹ Government Decision No. 861/2018, for approving the 2018 – 2022 *National Strategy against Trafficking in Persons and the 2018-2020 National Action Plan for the implementation of the 2018 – 2022 National Strategy against Trafficking in Persons*, p. 18, <https://anitp.mai.gov.ro/programe-si-strategii/>, (9.11.2022)

² *Idem*

³ *Idem*

⁴ *Report concerning the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings by Romania*, <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=0900001680683a1d>, (9.11.2022)

assistance services, emotional support, counseling psychological, legal counseling, professional orientation, social reinsertion”¹. The transposition of these provisions in the real social context is the most difficult challenge.

Criminal Procedure Code provides the victim’s right to be informed regarding the steps of the criminal investigation and other elements regarding the criminal trial and the status of the suspect (art. 81, art. 11 para. 5).

National Agency against Trafficking in Persons has put in place a specific program - Victim Witness Coordination in the Criminal Trial Program, which has the goal to support the victims in taking part in all procedures during the criminal trial, for the truth to be proved and the criminal to be convicted.

GRETA’s third evaluation round was focused on trafficking victims’ access to justice and “effective remedies, which is essential for victims’ rehabilitation and reinstatement of rights and reflects a victim-centered and human-rights-based approach to the fight against human trafficking”². GRETA also emphasizes that states have the duty to assure effective access to specific forms of assistance, based on international human rights law³.

Good practices - local inter-institutional cooperation teams

The actual victims’ access to remedies and to specialized assistance is depending on the local institution and organization’s actions. That’s the reason for the local anti-trafficking teams setting, coordinated by the county rapporteur - National Agency Against Trafficking in Persons (represented by the regional center). The annual workshop of the local anti-trafficking teams focuses on finding solutions for the most challenging cases. So, these local inter-institutional cooperation teams can be considered one of the good practices in implementing the human rights-based approach to the victims’ reintegration and healing process.

Regarding this mechanism, we need to emphasize the role of the National Agency against Trafficking in Persons in facilitating inter-institutional cooperation based on the "National Mechanism for the Identification and Referral of Victims of Human Trafficking"⁴. The main subjects to be discussed to enhance the sensitivity of public institutions and NGOs to human trafficking describe indicators used in

¹ Article 63 of Law No. 292/2011, http://www.mmuncii.ro/j33/images/Documente/Legislatie/Asistentia-sociala-2018/Legea_asistentei_sociale_18012018.pdf, (9.11.2022)

² GRETA evaluation report, third round, <https://rm.coe.int/evaluation-report-on-the-implementation-of-the-council-of-europe-conve/1680a2b0f8>, (9.11.2022)

³ Rantsev v. Cyprus and Russia, application No. 25965/04, the judgment of 7 January 2010; L.E. v. Greece, Application No. 71545/12, the judgment of 21 January 2016; Chowdury and Others v. Greece, Application No. 21884/15, judgment 30 March 2017; S.M. v. Croatia, application No. 60561/14, Grand Chamber judgment 25 June 2020, apud. GRETA evaluation report, third round, p.11, <https://rm.coe.int/evaluation-report-on-the-implementation-of-the-council-of-europe-conve/1680a2b0f8>, (9.11.2022)

⁴335/2007/432881/2007/1990/2007/1072/2007/266/2008/A6.880/2008/409/C/208/2353/C/2008 for the approval of the National Identification and Referral Mechanism of Victims of Trafficking in Persons

the assessment of a possible human trafficking situation, prevention activities for vulnerable people, trauma suffered by victims of human trafficking, and ways to assist them.

The method for achieving the best results in locally identifying remedies for human trafficking victims is the discussion of a possible situation, inspired by real cases. Each participating institution presents the method of intervention according to the legal powers in providing the necessary assistance to victims of human trafficking in the case of human trafficking, based on the obligations deriving from the competence of each institution and the responsibilities mentioned in the national action plan regarding the victims.

For example, they will have to draw solutions to the following situation, inspired by formal cases. “This morning, a human trafficking network was dismantled. The criminals exploited a group of 4 people: two female adults and two male adults (forced work), in a house on the outskirts of the town.

The victims were removed from the traffic situation and are currently at the prosecutor’s office for questioning. Status of victims:

- major female victim, 35 years old, with urgent medical needs, homeless and without family;
- the major female victim, in a fragile state of health, apparently with mental problems, with aggressive behavior (later it was found that she was classified as a permanently accentuated disability, non-revisable, established by an evaluation commission from another county); she has no family of affiliation and no identity document;
- the major victims, the men rescued from the traffic situation, are in an acute state of starvation, do not have medical insurance, have identity documents issued with the address of the trafficker, and want to return to their family, in a village on the edge of the county, although its material situation is precarious; one of them graduated from a vocational school and the other graduated from four grades”¹.

During the local inter-institutional cooperation teams have also the task of describing the specific actions that can be carried out by each institution to cover the assistance needs of the victims (for example, where each victim will be accommodated and who is in charge within the responsible institution, who provides the social worker responsible for the case, steps necessary to draw up identity documents, who and how provides medical assistance, procedures, documents that must be drawn up, who and how provides assistance to major victims - professional training, continuation of school, social reintegration, etc.).

The most challenging tasks derived from practice is to merge two or more approaches- that of a public institution, often with strict regulations and fixed budgets as the ones from the judicial/security areas, and that of a civil society organization, which is more flexible, but with little knowledge regarding the limitation of a criminal investigation.

¹ The case study is developed by the author and used in a specific local inter-institutional cooperation team, 2022

That's one of the roles of The National Agency Against Trafficking in Persons (represented by the regional center: to establish local specific mechanisms for the coordination of anti-trafficking activities and to make this network functional in crises by fostering partnerships between national and local actors working in the anti-trafficking field (public institutions and authorities, NGOs, other representatives of the civil society, the church, mass-media, etc.). In that regard, it is important to point out the partnership established with the Romanian Orthodox Church, which has strong charitable organizations in almost all cities and villages.

One of the most difficult challenges to overcome is the diversity of institutions' hierarchy systems. And by that, we are referring to the fact that some of the institutions are subordinated to a ministry authority, which makes measures easier to implement, because they are mandatory and there can be sanctions applied, and other organizations with an important role in victims' assistance and remedies measures are depending on the local authorities, which have the political decision. They have local autonomy in deciding upon the budget for the county and often they reluctantly in assisting a victim which has an address in another county. This is a bureaucratic issue and a political one that interferes with the assistance of effective measures for human trafficking victims. As it has been also noted in the literature, "it can also be observed that the policies face the difficulty of effective implementation, because many of the documents have a recommendation value, and not a mandatory one"¹.

The role of the National Agency Against Trafficking in Persons (represented by the regional center) is to overcome these difficulties, which is often done with the help of the non-governmental sector.

Suggestions for improving the administrative process of institutional cooperation are referring to the establishment of a local fund for crises in human trafficking cases and in rethinking the subordination and budget management of the local essential institution for victims' assistance as they should not depend on the local political will.

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¹ Mateuț Gheorghita, (Ed.), *Traficul de fiinte umane. Infractor. Victima. Infractiune*, Asociația Alternative Sociale Iași, Asociația magistraților Iași, 2005, p.203

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