



Human Rights Ombudsman
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**Information submitted by
the Human Rights Ombudsman of the Republic of Slovenia
to the Group of Experts on Action against Trafficking in Human Beings (GRETA)
Fourth Evaluation Round – Follow-up information after the country visit
(16–19 December 2025)

January 2026**

Introduction

The Human Rights Ombudsman of the Republic of Slovenia (the Ombudsman) welcomes the opportunity to submit follow-up information to the Group of Experts on Action against Trafficking in Human Beings (GRETA) in the context of the Fourth Evaluation Round, following the evaluation visit to the Republic of Slovenia carried out from 16 to 19 December 2025.

The Ombudsman is a constitutional and independent institution mandated to protect and promote human rights and fundamental freedoms in the Republic of Slovenia. It holds A-status accreditation in accordance with the Paris Principles. Within its mandate, the Ombudsman monitors the human rights situation, conducts research, issues opinions and recommendations to public authorities and examines individual complaints concerning alleged violations by state authorities, local authorities or public institutions. In the field of trafficking in human beings, the Ombudsman acts primarily on its own initiative, through systemic monitoring, research and inquiries.

During the country visit, the Ombudsman's representative met with members of the GRETA delegation and highlighted **persistent systemic shortcomings** in the prevention of trafficking in human beings and in the protection of victims in Slovenia. While acknowledging certain positive developments in recent years, the Ombudsman remains concerned that Slovenia still lacks a **comprehensive, stable and human rights-based system** to address trafficking in human beings in a consistent and effective manner.

This information is submitted in response to GRETA's request for additional written input following the country visit. It provides observations and information relevant to the implementation of the Council of Europe Convention on Action against Trafficking in Human Beings (hereinafter: the Convention) in Slovenia, with particular attention to **structural vulnerabilities, identification and protection of victims**, and the **effectiveness of institutional and legislative frameworks**. The information draws on the Ombudsman's monitoring activities, research and casework and reflects concerns relating, inter alia, to access to compensation, health care and psychosocial support for

victims, the application of the non-punishment principle, the identification of victims of forced begging and labour exploitation, the situation of migrants and asylum seekers, and the protection of children, including unaccompanied minors and children at risk of forced or early marriage.

The Ombudsman further recalls that the establishment of an **independent national rapporteur on trafficking in human beings** has not yet been established and enacted into law, despite long-standing recommendations by GRETA and the Ombudsman and despite existing consensus among key national stakeholders (Ministry of Interior and Ministry of Justice). The Ombudsman has consistently expressed its willingness to carry out this mandate. The absence of a legally grounded and independent monitoring mechanism continues to limit systematic evaluation of policies and measures in this field.

I. DETECTION AND IDENTIFICATION

1. Identification of victims among applicants for international protection (Article 10 of the Convention)

In 2025, the Human Rights Ombudsman of the Republic of Slovenia sought clarification from the Ministry of the Interior regarding the adoption of the Protocol on procedures for the identification of victims of trafficking in human beings among applicants for international protection, reportedly prepared in 2024. The Ombudsman also inquired about additional measures to improve identification, with particular regard to migrants and applicants for international protection, especially children and unaccompanied minors, in line with GRETA's recommendations.

The Ministry replied that, in 2025, a coordination meeting with non-governmental and humanitarian organisations was held to discuss additional measures for the protection of minors among applicants for international protection. Two key challenges were identified: (i) the absence of a unified communication channel between the Police and the Office for the Care and Integration of Migrants, and (ii) the lack of standard operating procedures for the identification of victims of trafficking, particularly unaccompanied children. In addition, the Ministry of Labour, Family, Social Affairs and Equal Opportunities, in cooperation with NGOs and UNHCR, began in 2024 to prepare standardised procedures for the identification of child victims, intended to be incorporated into the updated Manual on Identification, Assistance and Protection of Victims of Trafficking in Human Beings under the Action Plan for 2025–2026, and aligned with the new Pact on Migration and Asylum.

Regarding the expansion of entities authorised to formally identify victims, the Ministry reiterated that formal identification remains exclusively within the competence of the Police. Although NGOs, social workers and health professionals play an important role in early detection and support, they are not empowered to formally identify victims or initiate referral procedures. The Ministry further stated that the safety of unaccompanied minors among asylum seekers is rarely endangered, as many leave Slovenia within a few days, and that they are provided with information on trafficking risks and advised to seek assistance in other EU Member States if exploitation occurs.

The Ombudsman assesses that these measures do not constitute a substantial improvement in institutional responsiveness. The protocol has not been formally adopted, standardised procedures remain lacking, and no unified communication channel has been established. The continued exclusivity of police competence for formal identification is not in line with international standards, which favour a multidisciplinary approach and the establishment of a national referral mechanism.

The Ombudsman emphasises that merely informing unaccompanied minors about trafficking risks and referring them to assistance abroad does not fulfil the State's positive obligations. Victims, particularly children, must be proactively identified and protected in a timely manner, before exploitation occurs, and protection must not depend on a victim's initiative or cooperation in criminal proceedings.

Accordingly, the Ombudsman **recommends the prompt formal adoption and effective implementation of the protocol or equivalent standardised instruments for the identification and treatment of victims of trafficking among applicants for international protection, with particular emphasis on unaccompanied minors.** It further recommends the establishment of an effective, multi-stakeholder national referral mechanism, including a unified communication channel between the Police and the Office for the Care and Integration of Migrants, enabling the active involvement of NGOs, social workers and health professionals throughout the identification and referral process.

2. Forced Marriages as a Form of Trafficking in Human Beings (Article 10 of the Convention)

a) In the context of Centres for Social Work

In 2022 the Ombudsman addressed forced marriages in the context of Centres for Social Work (CSWs) as a broader systemic issue relevant to human rights protection and legal certainty in Slovenia. The assessment draws, inter alia, on the Family Code, the Domestic Violence Prevention Act, the Criminal Code (KZ-1), the Council of Europe Convention on Action against Trafficking in Human Beings, the Convention on the Rights of the Child (CRC), the European Convention on Human Rights (ECHR), and the Istanbul Convention.

A recent Handbook issued by the Government Office for National Minorities (on early and forced marriages in Roma communities)¹ describes an illustrative case of a minor brought to Slovenia for marriage in exchange for several thousand euros; the marriage ceremony reportedly took place in a Western Balkan country, followed by administrative registration in Slovenia. The victim's passport was confiscated, she was subjected to control and physical/psychological violence and forced into a servitude-like situation, including being compelled to authorise the perpetrators to collect registered mail. The victim filed a complaint. A similar pattern was addressed by the Maribor District Court², which convicted three co-perpetrators for trafficking in human beings under Article 113 of the Criminal Code (KZ-1) in conjunction with Article 20 of KZ-1, involving the "purchase" of a minor abroad for EUR 6,000 with the purpose of marriage, her transfer to Slovenia, restrictions on movement and communication, confiscation of documents, isolation and exploitation in domestic/servant-like work accompanied by intimidation and violence.

¹ Urad Vlade Republike Slovenije za narodnosti. *Priročnik o prepoznavanju zgodnjih in prisilnih porok v romski skupnosti in o ukrepanju v teh primerih*. Ljubljana, 2021. Available in Slovene at: https://www.gov.si/assets/vladne-sluzbe/UN/SIFOROMA-4/Urad-za-narodnosti_Nacionalna-platforma-za-Rome_prirocnik_165x240mm.pdf

² Judgment VSM III Kp 5830/2014, 17 June 2015. Available in Slovene at: [https://www.sodnapraksa.si/search.php?q=5830/2014&database%5BSOVS%5D=SOVS&_submit=i%C5%A1%C4%8Di&rowsPerPage=20&page=0&id=2015081111415825\]\(http://www.sodnapraksa.si/search.php?q=5830/2014&database%5BSOVS%5D=SOVS&_submit=i%C5%A1%C4%8Di&rowsPerPage=20&page=0&id=2015081111415825\)](https://www.sodnapraksa.si/search.php?q=5830/2014&database%5BSOVS%5D=SOVS&_submit=i%C5%A1%C4%8Di&rowsPerPage=20&page=0&id=2015081111415825](http://www.sodnapraksa.si/search.php?q=5830/2014&database%5BSOVS%5D=SOVS&_submit=i%C5%A1%C4%8Di&rowsPerPage=20&page=0&id=2015081111415825)

The Ombudsman gathered information from CSWs and found that, in 2021, none reported formal cases of forced marriage, including cases involving minors. However, many CSWs described early marriages and the escape of minors into harmful environments as ongoing issues, particularly within Roma communities. The Ombudsman expressed concern that these practices are under-identified and insufficiently addressed, citing the lack of proactive fieldwork and systemic tools for early detection. The Ombudsman further noted the absence of disaggregated data, especially regarding minors from vulnerable groups (such as Roma or foreign nationals), which hampers monitoring and effective prevention. CSWs highlighted multiple structural challenges, including staffing shortages, limited cultural mediation and language capacities, and weak inter-institutional coordination.

The Ombudsman **recommended: (i) strengthening CSWs' proactive fieldwork and early identification capacities regarding potentially exploitative practices, including forced and early marriages; (ii) urgent establishment of unified protocols and clearer operational guidance (including for registry officers and social workers); (iii) regular and specialised training; (iv) increased staffing and a strengthened presence of professionals in Roma settlements; and (v) enhanced cooperation with NGOs. The Ministry of Labour reported certain staffing increases in 2022, including posts dedicated to fieldwork with Roma communities.** The Ombudsman nevertheless assessed these measures as insufficient in light of the growing scale and complexity of the issues and reiterated the need for systemic and sustainable solutions.

b) In the context of Administrative Units

All 58 Administrative Units in Slovenia reported that they had not identified any cases of forced marriage or suspected applications for forced marriage. Their responses were based on general legal frameworks, namely the Family Code and the General Administrative Procedure Act, and on non-binding ministerial instructions, as the Family Code does not provide specific procedural rules for dealing with suspected forced marriages.

Administrative units reported the absence of a uniform approach. In cases of suspicion, most would consult with or notify the Ministry of the Interior, the Ministry of Labour, Family, Social Affairs and Equal Opportunities, the police or the prosecution. Many highlighted the difficulty of identifying coercion due to limited interaction with couples, the short duration of procedures and the lack of clear, dedicated protocols. Several explicitly called for official guidelines or a unified protocol, noting that reliance on discretionary assessments and general procedural rules is insufficient, particularly in cases involving minors.

All administrative units confirmed that they do not have specific guidelines or protocols for suspected forced marriages. Practices therefore vary considerably and are often determined on a case-by-case basis. Units also stressed evidentiary challenges, pointing out that suspicion alone is insufficient for issuing a negative decision and that coercion is particularly difficult to detect when both future spouses are present.

Some administrative units further noted a conflation of forced marriages with sham or fictitious marriages under the Family Code. Existing legal provisions and institutional practice are more developed in relation to marriages of convenience for immigration purposes, while forced marriage remains under-recognised and insufficiently addressed.

The Ombudsman assesses that the absence of identified cases does not indicate the absence of forced marriages, but rather reflects weak identification mechanisms,

inconsistent practices and insufficient training. Early and proactive identification, particularly of minors and other vulnerable groups, remains essential, in line with GRETA's recommendations.

Following the Ombudsman's recommendations, the Ministry of the Interior included awareness-raising measures for administrative unit staff in the Action Plan against Trafficking in Human Beings for 2025–2026. Since 2023, specialised training has been provided to registrars and other staff, clarifying that forced marriage may, where relevant elements are present, constitute trafficking in human beings under Article 113 of the KZ-1. The training was repeated in 2024 and will continue in 2025–2026, with a particular focus on vulnerable groups.

II. PROTECTION, ASSISTANCE AND SUPPORT

3. Access to health care for victims of trafficking in human beings (Article 12 in conjunction with Article 3 of the Convention)

The Ombudsman notes that Slovenia still lacks a systemic and legally regulated framework ensuring access to health care for victims of trafficking in human beings. Access to health services is currently based on an ad hoc arrangement stemming from a decision of the Interdepartmental Working Group on Combating Trafficking in Human Beings, under which the Ministry of Health issues individual certificates for identified victims, allowing access to emergency and additional medical care at the discretion of a physician.

The Ministry of Health maintains that this out-of-system approach is more efficient, particularly as many victims do not remain in Slovenia for an extended period. According to the Ministry, integration into the compulsory health insurance system would involve lengthy procedures and waiting times, potentially delaying treatment. Health care is therefore provided immediately, either within the public health system or, where necessary, by private providers, with all costs covered by the Ministry. On this basis, the Ministry does not plan legislative amendments.

The Ombudsman **acknowledges that this practice may enable rapid access to medical assistance in individual cases. However, it reiterates that a model operating outside the health insurance system and without a clear legal basis does not ensure legal certainty, equal treatment or predictability of rights. Access to health care remains dependent on discretionary, case-by-case decisions and temporary certificates, rather than on clearly defined statutory entitlements.**

The Ombudsman has **repeatedly warned, including in its Annual Reports for 2020 and 2021, that victims of trafficking often lack health insurance, which may hinder access to comprehensive, continuous and long-term health care. This is particularly problematic with regard to psychological and psychiatric support,** which is essential for recovery, reintegration and protection from re-exploitation, given the severe trauma experienced by victims.

The Ombudsman therefore **reiterates its long-standing recommendation (Recommendation No. 32/2020) that the insurance status of victims of trafficking in human beings be formally regulated by law. Only a statutory solution within the health care system can ensure legal certainty, equal treatment and effective, long-term access to health care for one of the most vulnerable groups.**

III. SPECIAL PROTECTION OF CHILDREN

4. Placement of unaccompanied minors with experience of trafficking in human beings (Article 12 of the Convention)

In 2025, the Ombudsman continued to monitor the placement of unaccompanied minors who are victims or potential victims of trafficking in human beings. As early as 2022, the Ombudsman recommended that the competent ministries urgently agree on a systemic solution ensuring specialised, child-specific accommodation and long-term support, in line with the principle of the best interests of the child.

In response to the Ombudsman's inquiries, the Ministry of the Interior stated that care for unaccompanied minors with experience of trafficking continues to be provided within the existing programmes "Crisis Accommodation" and "Safe Space". At the same time, it acknowledged that these programmes do not define clear, legally binding content or forms of assistance tailored to children, nor do they ensure appropriate placement for particularly vulnerable unaccompanied minors.

Crisis accommodation is provided under a contractual arrangement between the Ministry of the Interior and a non-governmental service provider. Capacities for the placement of children remain limited, and subsequent accommodation continues to rely on existing, non-specialised arrangements. Pending the establishment of a dedicated programme, the Protocol on Cooperation between Centres for Social Work and the Police in Assisting Unaccompanied Foreign Minors remains in use.

Both the Ministry of the Interior and the Ministry of Labour, Family, Social Affairs and Equal Opportunities have **acknowledged the need for a systemic, separate and more appropriate accommodation solution for unaccompanied minors with experience of trafficking**. Discussions on possible models, including smaller specialised residential units, have been ongoing, including in the context of the implementation of Directive (EU) 2024/1712. **However, no concrete, legally binding solution has yet been established.**

The Ombudsman **assesses that the current framework continues to rely predominantly on temporary, project-based or out-of-system arrangements, which do not ensure legal certainty, stability or specialised long-term support. The absence of clear, standardised and binding procedures, coupled with weak inter-institutional coordination, poses a serious risk to the effective protection of particularly vulnerable children.**

The Ombudsman therefore **reiterates the need for the urgent establishment of a legally binding and sustainable systemic framework governing all stages of assistance to unaccompanied minors with experience of trafficking, from identification and safe placement to long-term support, in full compliance with the principle of the best interests of the child and Slovenia's international obligations.**

IV. EXPLOITATION, CRIMINAL-LAW RESPONSE AND SAFEGUARDS FOR VICTIMS

5. Non-punishment of victims of trafficking in human beings (Article 26 of the Convention)

In 2025, the Human Rights Ombudsman of the Republic of Slovenia sought clarification from the Ministry of Justice regarding the implementation of the principle of non-punishment³ of victims of trafficking in human beings. In its reply, the Ministry reiterated the long-standing position of the Slovenian authorities that the principle of non-punishment is sufficiently ensured through Article 23 of the Criminal Code, which excludes criminal liability for acts committed under irresistible force. According to the Ministry, this provision adequately transposes Article 26 of the Council of Europe Convention on Action against Trafficking in Human Beings. The Ministry further stated that no cases are known in which victims of trafficking in human beings would have been prosecuted, convicted or punished.

The Ombudsman notes that **this position does not address the substance of the repeated recommendation of GRETA (paragraph 102 of GRETA(2023)05). Article 23 of the KZ-1 constitutes a general criminal law provision and does not amount to a specific, explicit and victim-centred non-punishment rule as required under Article 26 of the Convention. In particular, it does not reflect the broader understanding of coercion, vulnerability and dependency inherent in situations of trafficking in human beings.**

The Ombudsman further **underlines that the absence of known cases of prosecution or punishment of victims cannot substitute for a clear, foreseeable and legally binding framework. The lack of an explicit provision or binding guidance may itself contribute to inconsistent practice, under-identification of victims and the risk of secondary victimisation, including in misdemeanour and administrative proceedings.**

While welcoming the Ministry's intention to address the issue in an updated Handbook on Combating Trafficking in Human Beings by the end of 2025, the Ombudsman stresses that **such a handbook does not have binding legal force and cannot replace either a specific statutory provision or formal, binding instructions for police officers and prosecutors, as explicitly recommended by GRETA.**

The Ombudsman therefore **reiterates that Slovenia should reassess the adequacy of its legal framework on non-punishment, consider the adoption of a specific legal provision or binding guidance for law enforcement and prosecution authorities, and ensure a uniform and predictable application of the non-punishment principle in practice, also in light of the forthcoming transposition of Directive (EU) 2024/1712.**

6. Forced Begging as a Form of Exploitation under Trafficking in Human Beings (Article 26 in conjunction with Article 10 and 29 of the Convention)

In 2025, the Human Rights Ombudsman of the Republic of Slovenia monitored forced begging as a possible form of exploitation within trafficking in human beings. In doing so, the Ombudsman acted on the basis of Slovenia's obligations under the Council of Europe Convention on Action against Trafficking in Human Beings and European Union law, in particular Directive 2011/36/EU, as amended by Directive (EU) 2024/1712.

In recent years, the Ombudsman has intensified the systemic monitoring of begging as a potential form of trafficking in human beings, in particular following the amendment of the Criminal Code (KZ-1J), which explicitly included the exploitation of begging among the forms of exploitation under Article 113 of the Criminal Code. According to information

³ See also point 6 below.

provided by the Police, in the period 2018–2022 a total of 158 criminal offences of trafficking in human beings were dealt with, within which two victims of forced begging were identified in 2018. In the period 2019–2022, as well as in 2023 and in the first half of 2024, the Police did not conduct investigations into trafficking in human beings involving elements of begging. **In the Ombudsman’s assessment, these data do not exclude the existence of the phenomenon, but rather point to significant under-identification and to limitations of existing detection mechanisms, as the identification of trafficking in human beings largely depends on the proactive action of law enforcement authorities.**

In order to obtain a comprehensive overview, in 2025 the Ombudsman again addressed requests for information and explanations to the competent authorities concerning the detection, handling and recording of cases related to forced begging, the involvement of minors, the application of the principle of non-punishment of victims, and inter-institutional cooperation. At the same time, the Ombudsman obtained information from non-governmental organisations working with homeless persons and other vulnerable groups, which report instances of organised and, in some cases, cross-border begging. As the examination conducted in 2025 had not yet been completed at the time of drafting this information, final conclusions cannot yet be drawn.

In the context of monitoring the transposition of Directive (EU) 2024/1712, the Ombudsman sought clarifications from the Ministry of Justice (MoJ) regarding planned legislative and other measures, in particular with regard to the exploitation of begging, the principle of non-punishment of victims, and mechanisms for monitoring and coordination. **The Ombudsman is of the view that the MoJ explained its understanding of competences and only provided a general indication of planned legislative activities, without clarifying how Slovenia would ensure the timely and substantive transposition and effective implementation of the Directive, especially in areas of shared or inter-ministerial responsibility.** The MoJ stated that amendments to the KZ-1 and the Criminal Procedure Act were planned by the end of 2026, but did not specify whether these amendments would cover the expanded forms of exploitation, adjustments of sanctions, and national referral mechanisms for victims, as required by Directive (EU) 2024/1712, the transposition deadline of which is 15 July 2026.

With regard to **the principle of non-punishment of victims of trafficking in human beings, the MoJ stated that no amendments to the KZ-1 were planned, taking the view that Article 23 of the KZ-1 provides a sufficient basis for the application of this principle.** The Ombudsman found that this position does not address GRETA’s reiterated recommendation set out in paragraph 102 of the report GRETA(2023)05. The Ombudsman further notes that in 2025 GRETA launched the fourth evaluation round of the implementation of the Convention, within which Slovenia will also report on the implementation of these recommendations.

As regards the possible preparation of guidelines or protocols for prosecutors, judges and other authorities, the Ombudsman accepted the MoJ’s explanation concerning constitutional limits related to judicial independence, but stressed that the inquiry did not concern binding instructions to judges or prosecutors. Rather, it concerned the preparation or updating of non-binding professional guidance. **The Ombudsman recalled that Directive (EU) 2024/1712 (in particular Article 18b), the Council of Europe Anti-Trafficking Convention (Articles 10 and 26) and GRETA recommendations impose obligations regarding regular and specialised training and the development of appropriate professional practices, including in cases of exploitation of begging, and that the MoJ has a role in ensuring appropriate legislative, organisational and training frameworks.**

The Ombudsman expressed particular concern regarding the MoJ's response to the question whether the State ensures, or plans to ensure, enhancements of mechanisms for coordination, trend monitoring and data collection on the prevalence of exploitation of begging and other new forms of exploitation, or the establishment of effective operational mechanisms within the executive branch, as required by Articles 19 and 19a of Directive (EU) 2024/1712. The MoJ stated that this area would allegedly be addressed in the future through an amendment to the Human Rights Ombudsman Act, which would assign these tasks to the Ombudsman, and that consideration of this amendment by the Government was envisaged only in the second half of 2026.

The Ombudsman stresses that the national anti-trafficking coordinator is situated within the competence of the Ministry of the Interior, and that tasks relating to coordination, trend monitoring, and the collection and processing of data form part of the executive function of the State. **Any future reporting or oversight role of the Ombudsman, in line with Article 29(4) of the Convention, does not entail assuming the role of the national coordinator and cannot replace the State's obligation to ensure effective coordination, trend monitoring and systematic data collection mechanisms before the expiry of the transposition deadline of the Directive.**

The MoJ's reliance on a future amendment to the Human Rights Ombudsman Act, the consideration of which was envisaged only in the second half of 2026 and is dependent on the future legislative process, does not constitute an answer to the question whether the State is fulfilling, or plans to fulfil in a timely manner, its obligations under Directive (EU) 2024/1712. The response also failed to clarify the role of the MoJ in the transposition and implementation of the Directive, or how the allocation of responsibilities and inter-ministerial coordination are ensured. The Ombudsman will continue its examination of this matter in 2026.

V. REMEDIES AND INSTITUTIONAL FRAMEWORK

7. Asset recovery and compensation for victims of trafficking in human beings (Articles 15 and 23 of the Convention)

In its Annual Report for 2023, the Ombudsman assessed that access to compensation for victims of trafficking in human beings (THB) remained ineffective in practice. No compensation claims under the Crime Victims Compensation Act (ZOZKD) were filed by THB victims in the period 2017–2023, a finding confirmed by the Ministry of Justice and the Specialised State Prosecutor's Office and consistent with earlier GRETA conclusions.

While welcoming the abolition of the citizenship requirement in ZOZKD, the Ombudsman stressed that this amendment alone had not removed key obstacles to compensation. Persistent barriers include insufficient information and legal support for victims, lengthy judicial proceedings, limited asset tracing and confiscation, and the fact that many victims do not recognise themselves as victims of trafficking and therefore do not submit claims.

The Ombudsman highlighted the strong link between compensation and asset confiscation and reiterated that Slovenia remains the only EU Member State without formally established Asset Recovery Office (ARO) and Asset Management Office (AMO) structures. The absence of these bodies weakens effective confiscation

and limits the use of seized assets for victim compensation. **The Ombudsman therefore reiterated its recommendation to urgently establish ARO and AMO and to consider a compensation fund for THB victims financed, inter alia, from confiscated assets.**

These findings were confirmed at the Round Table Follow-up to GRETA's 3rd evaluation report (10 December 2024). The Ministry of Justice acknowledged that, **despite the removal of the citizenship requirement, no THB victim had applied for compensation, attributing this primarily to victims' focus on criminal proceedings and immediate survival needs, and noted slow progress in establishing ARO and AMO due to institutional challenges and past negative experiences.** The Specialised State Prosecutor's Office further emphasised that victims often disengage from proceedings at an early stage, that assets are frequently unavailable or difficult to trace, and that lengthy organised crime proceedings undermine effective confiscation.

In February 2025, the Government approved a draft amendment to the Confiscation of Assets of Illicit Origin Act (ZOPNI), introducing measures aimed at strengthening confiscation procedures, including the confiscation of substitute assets and extended procedural deadlines following temporary freezing. In parallel, the Government confirmed plans to reform the framework for freezing, confiscation and management of seized assets, including the establishment of ARO and AMO structures, in order to transpose the forthcoming EU asset recovery directive by November 2026.

Overall, the Ombudsman concludes that, despite certain legislative developments, structural and practical barriers continue to prevent effective access to compensation for victims of trafficking in human beings, in line with GRETA's concerns.

8. Systematic collection of disaggregated data based on protected personal characteristics

In its Annual Report for 2024, the Human Rights Ombudsman of the Republic of Slovenia reiterated Recommendation No. 6 (2019), **calling on the competent authorities to ensure the systematic collection of disaggregated data based on protected personal characteristics across all areas of social life, in order to enable an accurate assessment of inequalities and trends in society.**

In its follow-up report, the Government maintains that this recommendation has been implemented, **referring to Article 6(5) of the Personal Data Protection Act (ZVOP-2).** This provision allows for the processing of personal data on national or ethnic origin under strict constitutional conditions, namely where such processing is strictly necessary for deciding on the rights of individuals and is specifically regulated by sectoral legislation.

The Ombudsman acknowledges that ZVOP-2 establishes a legal possibility for the collection of disaggregated data. However, it emphasises that the existence of a legal basis alone does not ensure that such data are systematically collected, available or used in practice. In the absence of sector-specific legislation and effective implementation, reliable and comprehensive insight into inequalities cannot be achieved.

The Ombudsman therefore continues to reiterate Recommendation No. 6 (2019), stressing that the effective collection and availability of disaggregated data are essential for evidence-based policymaking, monitoring inequalities and protecting vulnerable groups, including in areas relevant to the prevention of trafficking in human beings and the protection of victims.

9. Establishment of an Independent National Rapporteur on Trafficking in Human Beings within the Office of the Ombudsman (Article 29)

The Ministry of Justice prepared a draft amendment to the Human Rights Ombudsman Act providing for the establishment of an independent national rapporteur on trafficking in human beings within the Office of the Ombudsman. However, **the draft has not yet been submitted to the National Assembly, and the position of national rapporteur remains unestablished.**

In December 2025, the Ministry of Justice indicated that consideration of the amendment is envisaged **only in the second half of 2026, noting that the further legislative process will depend on the future composition of the National Assembly and the formation of a new Government following the regular parliamentary elections scheduled for March 2026.** The Ombudsman continues to advocate for the adoption of this amendment as a key measure to ensure systematic monitoring, independent oversight and improved institutional responsiveness in the fight against trafficking in human beings.

The Ombudsman trusts that the information provided will assist GRETA in its ongoing evaluation of the implementation of the Convention in Slovenia.