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ORGANIZED CRIME

EXPLOITED IN PLAIN SIGHT

An assessment of commercial sexual
exploitation of children and child protection
responses in the Western Balkans



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Acronyms and abbreviations

CSAM	Child sexual abuse material
CSEC	Commercial sexual exploitation of children
ECPAT	End Child Prostitution and Trafficking
ICT	Information and communication technology
ISP	Internet service provider
NCMEC	National Center for Missing and Exploited Children
SECTT	Sexual exploitation of children in travel and tourism
UNCRC	United Nations Convention on the Rights of the Child
UNICEF	United Nations International Children's Emergency Fund
UNODC	United Nations Office on Drugs and Crime
UNTOC	United Nations Convention against Transnational Organized Crime
UNWTO	United Nations World Tourism Organization

Glossary of key terms

Budapest Convention

(Council of Europe Convention on Cybercrime)

Instrument serving as a guideline for any country developing comprehensive national legislation against cybercrime and as a framework for international cooperation between state parties.

Child marriage

Term indicating the marriage of a girl or boy before the age of 18 and that refers to both formal marriages and informal unions in which children under the age of 18 live with a partner as if married.

Tech-facilitated CSEC/Online Child Sexual Exploitation

Refers to the sexual abuse of a person below the age of 18, as well as to the production of images of such abuse and the sharing of those images online. Online child sexual exploitation is a constantly evolving phenomenon and is shaped by developments in technology.

Child pornography

Any content that depicts sexual exploitation involving a child. Visual depictions include photographs, videos, digital and computer-generated images indistinguishable from an actual minor.¹

Child prostitution

Sexual exploitation of a minor or person under the legal age of consent. In most jurisdictions, commercial sexual exploitation (used with the term child prostitution) is illegal as part of a general prohibition on prostitution.

Children on the move


Children moving voluntarily or involuntarily, within or between countries, with or without their parents or other primary caregivers, and whose movement might place them at risk (or at an increased risk) of economic or sexual exploitation, abuse, neglect and violence.

Cybercrime	Crime that involves a computer and a network. The computer may have been used in the commission of a crime or it may be the target. Cybercrime may threaten a person, company or a nation's security and financial health.
Cybersecurity	Protection of internet-connected systems such as hardware, software and data from cyberthreats. The practice is used by individuals and enterprises to protect against unauthorized access to data centres and other computerized systems.
Dark web	The dark web is the World Wide Web content that exists on darknets: overlay networks that use the internet but require specific software, configurations or authorization to access.
Encrypted communication/ Encryption	Process of encoding information to prevent anyone other than its intended recipient from viewing it. The encrypted information is unreadable to anyone who does not have access to a special key used to decrypt the information which renders it readable.
Forced begging	A form of exploitation in which a person is forced or coerced to collect donations, usually monetary in kind. Beggars are forced to partake in activities, ranging from asking strangers for charitable donations to selling small items, in which most of the profits made are kept by the traffickers.
Lanzarote Convention (Council of Europe Convention on Protection of Children against Sexual Exploitation and Sexual Abuse)	Instrument that criminalizes all kinds of sexual offences against children. It sets out that parties shall adopt specific legislation and take measures to prevent sexual violence, to protect child victims and to prosecute perpetrators.
Palermo Protocols	Protocols adopted by the United Nations to supplement the UNTOC (UN Convention on Transnational Organized Crime, also the Palermo Convention). They are the Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children; the Protocol against the Smuggling of Migrants by Land, Sea and Air; and the Protocol against the Illicit Manufacturing and Trafficking in Firearms, Their Parts and Components and Ammunition.
Telegram	Freeware, cross-platform, cloud-based instant-messaging software and application service. The service also provides end-to-end encrypted video calling, VoIP, file sharing and several other features.
WB6/Western Balkan Six	Group of countries consisting of: Albania, Bosnia and Herzegovina, Kosovo, ² Montenegro, North Macedonia and Serbia.



EXECUTIVE SUMMARY

From an impoverished settlement, the child pictured is being offered for as little as
€25 a day. © Bahrudin Bandić



The Western Balkan Six (WB6) have historically not been at the centre of attention and research investigating commercial sexual exploitation of children (CSEC). Despite a growing body of literature on human trafficking in south-eastern Europe generally, there is little data on CSEC specifically. Information is rarely reported by local media, also because the patriarchal and traditional structure of societies in the Western Balkans fuels a widespread belief that sexual exploitation of children either does not exist or is an exception rather than the rule. Very few reports have therefore previously looked at the WB6's role, its vulnerabilities and contribution to the CSEC phenomenon in a comprehensive way. At the same time as CSEC is gaining attention globally, societies and institutions in the Western Balkans continue to have low levels of awareness and capacity to take on the phenomenon.

CSEC manifests itself in several interconnected forms in the WB6, including in sex trafficking of minors, exploitation of children in travel and tourism, early and forced marriage and sexual exploitation in venues such as brothels, bars and strip clubs. It is also reflected in the creation and distribution of child sexual abuse materials (CSAM) online, including but not limited to the recording, live-streaming, sharing and downloading of materials depicting minors being sexually exploited. There are also several overlaps between CSEC and other forms of exploitation, including labour exploitation (e.g., begging). Even before the COVID-19 pandemic hit the WB6, the region was recording an increasing number of CSEC cases.

Given the lack of research and court data which could serve as a basis of analysis, there is no common profile of perpetrators involved in CSEC in the region. In fact, it seems that perpetrators are operating across the region without much scrutiny, facilitated by digital technologies and networks, the rise in tourism and widespread weaknesses in the child protection system. Criminal actors also take advantage of the region's socio-economic vulnerabilities and endemic marginalization, making various ethnic minorities even more vulnerable.

This report assesses children's vulnerability to CSEC across the WB6 and focuses specifically on online sexual exploitation of children and sexual exploitation of children in travel and tourism (SECTT). It also provides an overview of what law enforcement authorities, private companies and civil society organizations are doing – and what they are not doing – to respond to, combat and prevent the various manifestations of CSEC.

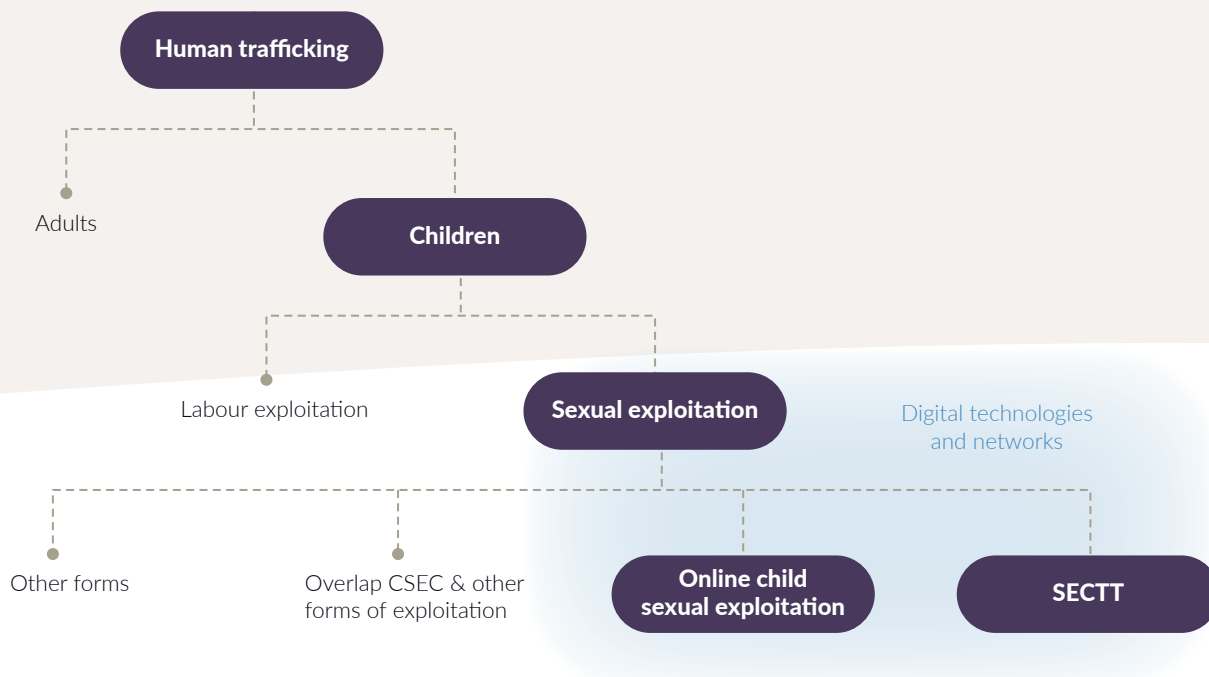


FIGURE 1 Focus of the report.

The report first assesses the current situation in the WB6 and provides an overview of child marriage, SECTT and tech-facilitated CSEC. It also looks specifically at the profile of children at risk (including Roma children and children on the move), the perpetrators of CSEC and the impact of COVID-19. The second part of the report then examines the current responses to CSEC. It outlines the child protection infrastructure by law enforcement authorities and the criminal justice systems, and also assessing the individual support mechanisms provided by civil society across the region and the role of the private sector, especially of internet service providers (ISPs) and the hospitality industry.

Since research and media coverage of CSEC online are rather scarce in the region, this report is based primarily on qualitative interviews: 11 experts on the ground conducted more than 135 interviews between October 2020 and February 2021 with law enforcement officers and representatives of the judiciary, travel and tourism and tech company employees, ISPs, shelters and other civil society organizations dealing with human trafficking and child abuse. The data was then triangulated and cross-checked with information gathered from governments, reports by international organizations and the few available cases reported in the local media. In total, more than 150 sources were consulted for this report. Figure 2 shows the research process from June 2020 to March 2021.



FIGURE 2 The research process.

All findings were also discussed in a regional expert group meeting in mid-March 2021. There, the experts emphasized again that, despite a growing body of literature on the topic of human trafficking in the WB6, there is still a considerable lack of understanding of CSEC and insufficient responses. For example, the term ‘child pornography’ continues to be widely used as a legal definition – despite being misleading and inaccurate. Given that it downplays the exploitative nature of the phenomenon and implies legitimacy from the perpetrator’s side and compliance from the child victim, it is strongly recommended that the terms ‘child sexual abuse’ and ‘exploitation’ are used instead.

However, challenges lie not only in defining the terms and the extent of CSEC, but also in identifying the victims, understanding the social dynamics between the traffickers and trafficked persons and distinguishing between different forms of exploitation. It seems that at the moment, although national legal frameworks generally comply with international standards, there is neither a holistic multi-stakeholder approach in place nor are there sufficient resources available to counter and reduce children’s vulnerability to sexual exploitation in an adequate way across the region.

Forms of CSEC are present across all countries of the WB6 and each country has the responsibility to respond to and prevent the spread of CSEC at the national level. However, given the region’s shared vulnerabilities and the transnational character of the phenomenon, a joint regional approach is required to ensure a successful and effective response. The report also provides concrete recommendations and illustrates best practice examples for the way forward. In particular, the report recommends setting up a regional WB6 prevention network to:


- Enable a virtuous cycle of practice and research;
- Support WB6 work to raise awareness by creating focused media campaigns and training materials;
- Set up working groups that will facilitate the exchange of best practices and work on concrete initiatives to generate tangible output.



GLOBAL PHENOMENON OF COMMERCIAL SEXUAL EXPLOITATION OF CHILDREN

This child is being assisted by a local child protection NGO in Bosnia and Herzegovina.

© Bahrudin Bandić



The International Labour Organization estimates that about 1 million children are victims of commercial sexual exploitation worldwide.³ In addition, the Council of Europe and the National Center for Missing and Exploited Children (NCMEC) estimate that, in Europe and the US, one-fifth of children are subject to some form of violence, including sexual abuse.⁴

CSEC is the sexual abuse and exploitation of a child, or a person under the age of consent, usually below the age of 18, for economic and monetary gain (in cash, goods or in-kind benefits).⁵ CSEC threatens the physical and psychosocial well-being and integrity of children.⁶ According to Articles 19 and 34 of the Convention on the Rights of the Child, the first international agreement recognizing the human rights of children,⁷ countries are urged to take all appropriate measures and efforts to 'protect the child from all forms of physical or mental violence' and to prevent the inducement or coercion and exploitative use of children in any unlawful sexual practices and activities.

Furthermore, the ILO's Convention No. 182 (1999) defines sexual exploitation as one of the worst forms of child labour.⁸ CSEC also falls under the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children,⁹ which was adopted in December 2000.¹⁰ The Protocol specifies that, as far as children are concerned, 'recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation' are sufficient to constitute trafficking in persons. The evidence of the means used (threat or use of force and other forms of coercion, abduction or deception) or of the child's consent is irrelevant.

Summary

- CSEC is widespread with about 1 million estimated victims worldwide.
- The issue of consent and evidence of the means used (threat, violence, coercion) are irrelevant in CSEC.
- There are three levels of CSEC risk factors: individual- and family, peer- and community, macro-environment and system levels. The risk factors can be present simultaneously across different levels, and when functioning in combination, they are likely to present a higher overall risk to the vulnerable groups.
- CSEC entails numerous serious mental, physical, social and legal consequences for the survivors. Survivors might experience being re-victimized over again when the illicit materials are further circulated online. CSEC survivors should be recognized and treated as such, instead of being criminalized for behaviours and activities from which their exploitation has inextricably led to (e.g. juvenile delinquency, drug/alcohol addiction).
- The use of digital technologies by CSEC traffickers has brought about numerous challenges to anti-CSEC efforts, including increased children's online vulnerabilities, enhanced anonymity in criminal activities, increased pressure on stakeholders to improve existing legal frameworks, cross-border and multi-stakeholder collaboration and technical skills

Risk factors

Understanding the risk factors contributing to CSEC is essential to addressing the problem, as well as to designing policies and interventions for preventing and mitigating it.

Concerning potential victims, their risk factors leading to CSEC can be identified at multiple levels, as shown in Figure 3.

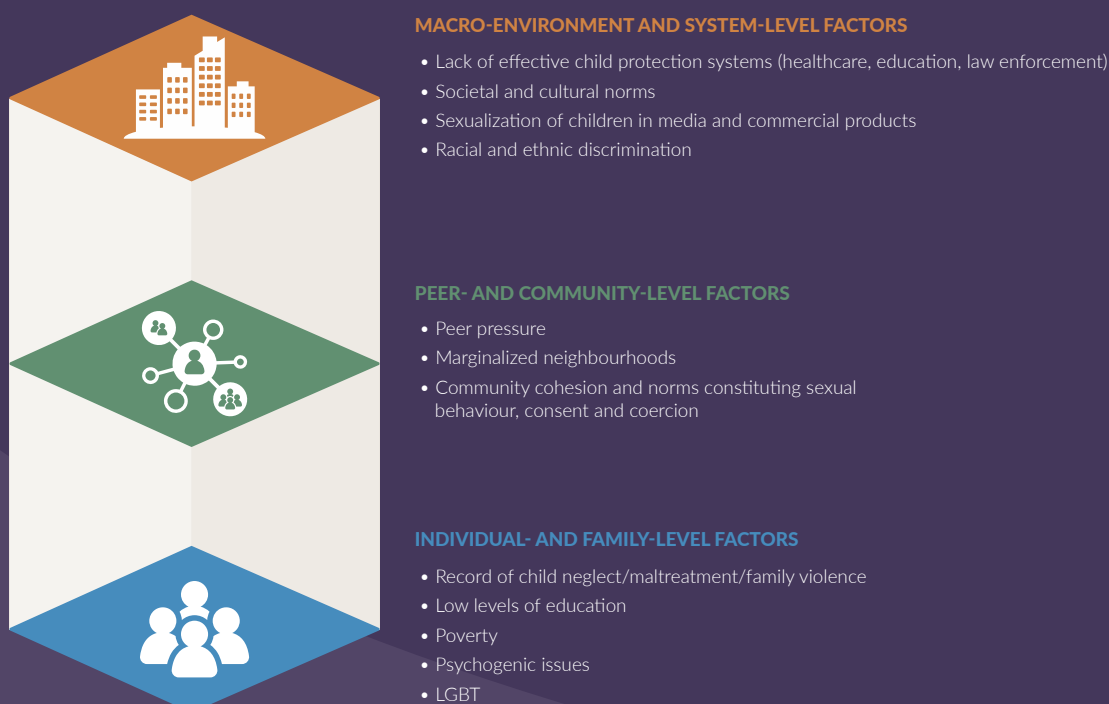


FIGURE 3 CSEC risk factors.

SOURCE: Institute of Medicine and National Research Council, 2013.

These risk factors can be present simultaneously across the different levels mentioned above. When functioning in combination, they are likely to lead to a higher overall risk to the vulnerable groups. It is worth noting that there is significantly less mention of CSEC of boys in the literature. Studies reported that male victims of CSEC were much less visible and likely to be identified than their female counterparts, even though the two share multiple risks of falling victim to CSEC, including high levels of family violence and child maltreatment.¹¹ In the Western Balkans context, this has also been observed and reported, as discussed in more detail below.

Consequences

Among the numerous consequences of CSEC, traumatization, life-long impact on the mental, physical and social health and development of the child victim are most commonly reported.¹² These include high levels of depression, suicidality, memory loss, aggression, excessive use of or addiction to drugs and alcohol, anxiety, post-traumatic stress disorder, Stockholm syndrome, physical health problems such as psychosexual dysfunction, reproductive health issues or even sexually transmitted disease, personal experiences, suffering of guilt, shame and social stigma.¹³ In cases where CSEC is kept in material form such as images or videos, the child might experience re-victimization when these materials are further circulated, uploaded or shared online.

SOCIAL AND LEGAL	MENTAL AND PHYSICAL
<ul style="list-style-type: none"> • Traumatization/suicidality • High levels of depression • Drug/alcohol addiction • Post-traumatic stress disorder • Stockholm syndrome • Reproductive health issues • Sexually transmitted disease 	<ul style="list-style-type: none"> • Re-enter commercial sex industry • Peer pressure • Become a trafficker • Engage in criminal activities • Juvenile delinquency

FIGURE 4 Consequences of CSEC.

SOURCE: Ellen Wright Clayton, Richard D Krugman and Patti Simon (eds), *Confronting Commercial Sexual Exploitation and Sex Trafficking of Minors in the United States*, Institute of Medicine and National Research Council, Washington DC: The National Academies Press, 2013, <https://ojjdp.ojp.gov/sites/g/files/xyckuh176/files/pubs/243838.pdf>.

CSEC can also lead to multifaceted legal consequences for the victims. Facing many mental, physical and social problems due to CSEC, coupled with the lack of timely and appropriate intervention, minors who are former CSEC victims are more likely to be re-exploited, enter commercial sex work as adults and/or engage in criminal activities. These might lead to a range of criminal charges against them, such as juvenile delinquency or the abuse, smuggling or trafficking of illicit substances, thus trapping the victims in a vicious circle.¹⁴ It is therefore crucial to recognize and treat CSEC victims as such, instead of criminalizing and prosecuting the behaviours and activities to which their exploitation has inextricably led.

Role of digital network technologies

As technological advancements are continuously transforming the global economy, they have led to the emergence and expansion of several cyber-enabled offences, including online child sexual exploitation.¹⁵ CSEC is reportedly one of the crimes adapting most quickly to and capitalizing on the opportunities offered by technology. Digital and network technologies can now be found in every stage of the CSEC process: (1) member-only dark web forums and encrypted communication apps such as ShadowCrew and WhatsApp have reportedly been used by traffickers to securely and anonymously communicate and plan their criminal activities; (2) children are found to be groomed and manipulated via Instagram, Facebook, Snapchat and KIK;¹⁶ (3) minors are being coerced into CSEC via Skype, online games and virtual worlds like Second Life and VRChat;¹⁷ (4) such illicit activities are then live-streamed, recorded and stored in cloud-based applications such as Dropbox, Google Drive and OneDrive, before being further distributed via peer-to-peer networks or in invitation-only forums on both the surface web and the dark web;¹⁸ (5) traffickers have reportedly 'advertised' their CSEC victims on websites such as Backpage and Craigslist;¹⁹ (6) illicit proceeds and transactions are then anonymously distributed and circulated among CSEC purchasers, traffickers and criminal networks; and lastly, this tech-enhanced criminal activity circle is then restarted at (1), or at the planning phase of the crime.

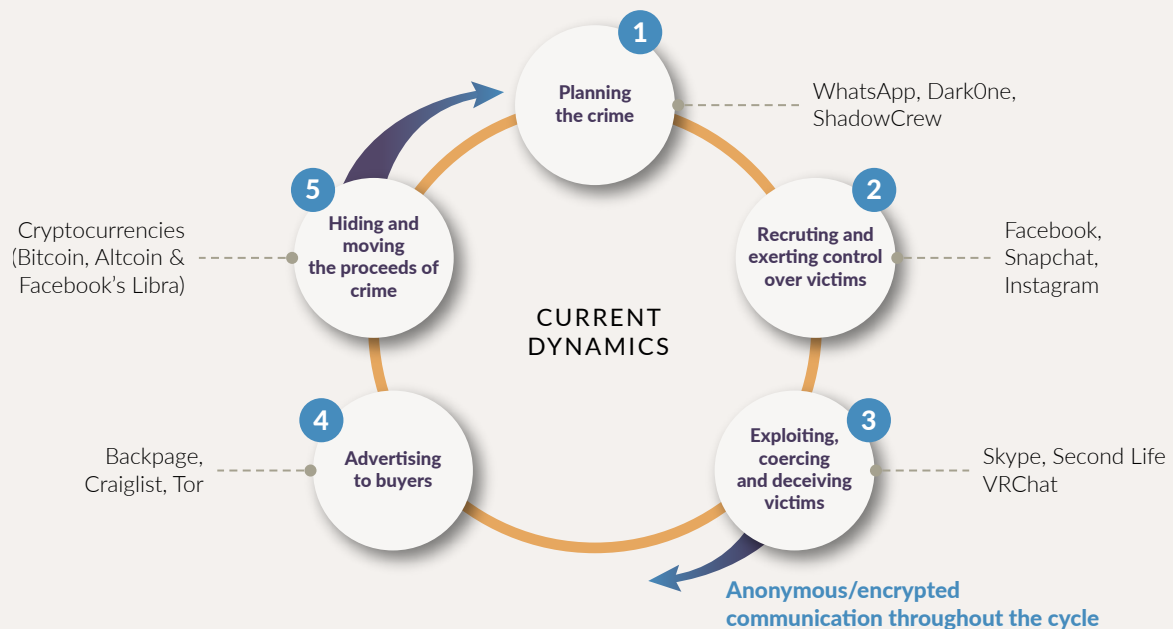


FIGURE 5 The role of digital technologies.

SOURCE: Lucia Bird et al, Transformative technologies: How digital is changing the landscape of organized crime, Global Initiative Against Transnational Organized Crime, June 2020, <https://globalinitiative.net/wp-content/uploads/2020/06/Transformative-Technologies-WEB.pdf>.



The use of digital technologies by CSEC traffickers has brought about numerous challenges to anti-CSEC efforts:

- A major shortcoming is the limited technical skills of law enforcement agencies, national investigation teams and civil society organizations. Digital technologies have not only increased children's online vulnerabilities, but also enhanced anonymity in criminal activities, making it challenging for stakeholders to identify and detect CSEC victims and materials, as well as to conduct investigations or trace CSEC-related illicit financial flows.²⁰
- Furthermore, cybersecurity legislation, especially addressing CSEC, is lagging and remains fragmented.
- There is also an insufficient legal framework to guide cross-border collaboration, communication, jurisdictional investigations and prosecutions of tech-facilitated CSEC, despite the cross-border nature of the crime itself.²¹


These factors have all significantly contributed to the rise of reported CSEC and its materials online, even prior to the coronavirus pandemic. The UN Human Rights Council's Special Rapporteur on the sale of children reported that, at any given time, there are about 750 000 predators worldwide connected to the internet and digital platforms.²² Global technology companies reported over 45 million online CSEC images and videos in 2018 – double the number recorded in 2017.²³ Material hosted in EU countries accounted for more than two-thirds of all illicit materials in 2019.²⁴

▲ Law enforcement agencies have limited technical skills to counter the use of digital technologies by CSEC traffickers. © Besart Cani



BACKGROUND AND CONTEXT OF **THE WESTERN BALKANS**

Children beg for money from passing cars in Tirana, Albania. © Besart Cani



The previous section discussed the CSEC phenomenon, its contributing risk factors and consequences on a global scale. Although this gives an important overview of the CSEC phenomenon itself, CSEC might manifest differently according to regional factors and specifics. It is therefore equally important to look at the particular social, economic and political conditions, as well as the digital infrastructure and regional context of the Western Balkans, which might diminish or facilitate certain forms and risks of CSEC in the region.

Summary

- After the break-up of Yugoslavia, criminal groups were quick to circumvent the newly established administrative borders. Today, the Western Balkans are region of origin, transit and destination of both human smuggling and trafficking in human beings.
- Information and data on commercial sexual exploitation of children in the Western Balkans is rarely reported by local media, also due to the generally patriarchal structure of societies in the region, which fuel a widespread belief that the phenomenon either does not exist or is the exception rather than the rule.
- Data on human trafficking in the Western Balkans provided by the UNODC and the US State Department show that the biggest number of victims for sexual exploitation are adult women. However, the number of girls is not to be underestimated.



FIGURE 6 The focus countries.

The Western Balkans continues to face socio-economic challenges. Across the region, unemployment is still more than three times higher than the EU average,²⁵ with a youth unemployment rate of 35% – one of the highest in the world.²⁶ Unemployment rates are expected to increase significantly due to COVID-19. By October 2020, the World Bank estimated that an additional 300 000 people from Albania, Kosovo, Montenegro and Serbia had fallen into poverty due to COVID-19.²⁷ The COVID-19 pandemic therefore increases the number of vulnerable people at risk of falling victim to human trafficking and other forms of exploitation.

The region's institutional and economic instabilities have contributed to the creation of an ecosystem of crime and corruption, in which illicit markets and criminal actors flourish.²⁸ This has led some to define the WB6 as 'stabilocracies' – countries led by elites who claim to provide stability both within and across national boundaries, but whose institutions are subject to illicit influence and are de facto controlled by criminal actors.²⁹

Located at the crossroads between the East and the West, the Western Balkans have historically been a transit route for the trafficking of both people and goods. In fact, following the break-up of Yugoslavia, criminal groups were quick to circumvent the newly established administrative borders. Today, the Western Balkans continues to be a region of origin, transit and destination for both human smuggling and trafficking in human beings.³⁰

However, despite a growing body of literature on human trafficking, there is still a considerable lack of understanding of the phenomenon across the region. There are numerous challenges not only to define the extent of human trafficking, but also to identify victims both offline and online, understand the social dynamics between traffickers and trafficked persons and even to distinguish trafficking from other similar crimes, such as human smuggling or international sex work.³¹

In 2020, the UNODC estimated that one out of five women identified as a victim of trafficking in Western Europe was from south-eastern Europe.³² Both the UNODC and the US State Department publish statistics on the number of victims of human trafficking (divided by the form of exploitation) in the Western Balkans and provide an overview of child victims.³³ These show that although the biggest number of victims of sexual exploitation are adult women, the number of girls is not to be underestimated.³⁴ In addition, while the number of male victims detected in the region is generally lower than that of women, boys are more vulnerable to sexual exploitation than adult men.³⁵

Information and data on commercial sexual exploitation of children in the Western Balkans is also scarce due to the fact that the issue is rarely reported on or dealt with in the local media. Furthermore, the generally patriarchal and traditional structure of societies in the Western Balkans fuels a widespread belief that sexual exploitation of children either does not exist or is an exception rather than the rule.

The evidence presented in this report suggests otherwise, as the data gathered on children shows the existence of vulnerabilities and exposure to sexual exploitation. These vulnerabilities have increased in recent years due to various factors, such as technological developments and the increase in tourism across the region. So far, there appears to be no coherent approach to counter and reduce children's vulnerability to sexual exploitation in the WB6 neither by governments, law enforcement agencies, civil society or the private sector. Although the national legal frameworks broadly comply with international standards, their implementation is often hampered by a lack of awareness, capacity and even technological means to efficiently address the phenomenon.

As will be examined in the following sections, the regional social-economic factors, coupled with the institutional instabilities and the lack of adequate reporting and implementation of legal frameworks and response mechanisms have paved the way for several CSEC manifestations, including child marriage and the sexual exploitation of children via digital technologies and/or in travel and tourism.


Although the biggest number of victims of sexual exploitation are adult women, the number of girls is not to be underestimated.



COMMERCIAL SEXUAL EXPLOITATION

OF CHILDREN IN THE WB6

Roma children and children on the move are particularly vulnerable to this form of exploitation in the region. © *Bahrudin Bandić*



CSEC manifests itself in several interconnected forms in the Western Balkans, including in the sex trafficking of minors; exploitation of children in travel and tourism; child marriage; sexual exploitation in venues such as brothels, bars and strip clubs; and the creation and distribution of child sexual abusive materials, including but not limited to the recording, live-streaming, sharing and downloading of materials depicting sexual exploitation of minors.³⁶ And the problem seems to be growing.

The following chapter looks at the main CSEC manifestations across the Western Balkans. This includes a detailed look at sexual exploitation in travel and tourism, tech-facilitated exploitation and child marriage. However, despite the different focus points, it is important to keep in mind that not all cases are clear cut. In fact, there were several overlaps identified not only between the different types of exploitation but also in the methods used. How closely different forms of exploitation are connected also becomes apparent when looking at the profile of the children at risk and the types of perpetrators who are described in the second part of this chapter.

Summary

- Children vulnerable to CSEC often share a common profile, which is often based on certain specific socio-economic circumstances of the family, lack of engagement and prevention of the child protection system. Roma children and children on the move were identified as particularly vulnerable.
- In contrast, due to lack of research and court data, there is no common profile of the perpetrators involved in CSEC.
- Various forms of sexual exploitation of children in the Western Balkans are tech-facilitated and involve grooming, sexting, sextortion, live sexual abuse or CSAM. Cases of tech-facilitated sexual exploitation of children are rising in the Western Balkans.
- Child marriage often takes place within ethnic minority communities in the Western Balkans, particularly the Roma community. It often leads to extreme and perpetual exploitation dynamics, which can include sexual and labour exploitation.
- Sexual exploitation in travel and tourism also appears to follow other child trafficking patterns. Looking at SECTT, it is not only important to look at exploitation within the tourism industry but also volunteerism and seasonal work. However, given that is not defined as a separate crime in the Western Balkans, data on prevalence is scarce.
- COVID-19 has increased the vulnerability of children for both online and offline sexual exploitation as it exacerbates some of the key factors that facilitate sexual exploitation in the first place.

Travel and tourism

As previously mentioned, SECTT is one manifestation of CSEC in the Western Balkans. SECTT usually refers to the commercial sexual exploitation of children by people who travel from their home district, region, or country to another place to engage in sexual activities with minors. Individuals engaged in SECTT can be domestic travellers or international tourists. SECTT usually involves the use of accommodation, transportation and other tourism-related services that facilitate contact with children and enable perpetrators to remain fairly inconspicuous. SECTT involves the exchange of cash, clothes, food or some other form of consideration to a child or to a third party for sexual contact.³⁷ According to End Child Prostitution and Trafficking (ECPAT), some exploiters of SECTT, including child abusers and paedophiles, specifically target minors whereas others 'take advantage of the situation where children are made available to them'.³⁸

Prior to the pandemic, tourism was among the largest and fastest-growing industries in the Western Balkans. The region has recorded a significant annual increase in foreign tourists since visa liberalization with the EU in 2009/2010. Over one million tourists were recorded travelling to Montenegro in both 2018 and 2019.³⁹ In Albania, the number of foreigners entering the country almost doubled between 2014 (3 415 550 arrivals) and 2019 (6 094 889 arrivals),⁴⁰ while in Kosovo, the number of foreign tourists nearly quadrupled between 2014 (46 477) and 2019 (177 358).⁴¹ Indeed, the six Western Balkan countries have become a top tourist destination not only for people living and working in the region, but also for travellers from Turkey, the EU and Russia.⁴² While this is good for the region's tourism industry, it poses increased risks of the sexual exploitation of children, particularly from vulnerable communities.⁴³

▼ Children from across Albania are approached online and brought to urban centres such as Tirana, pictured below, for sexual exploitation.

© Besart Cani



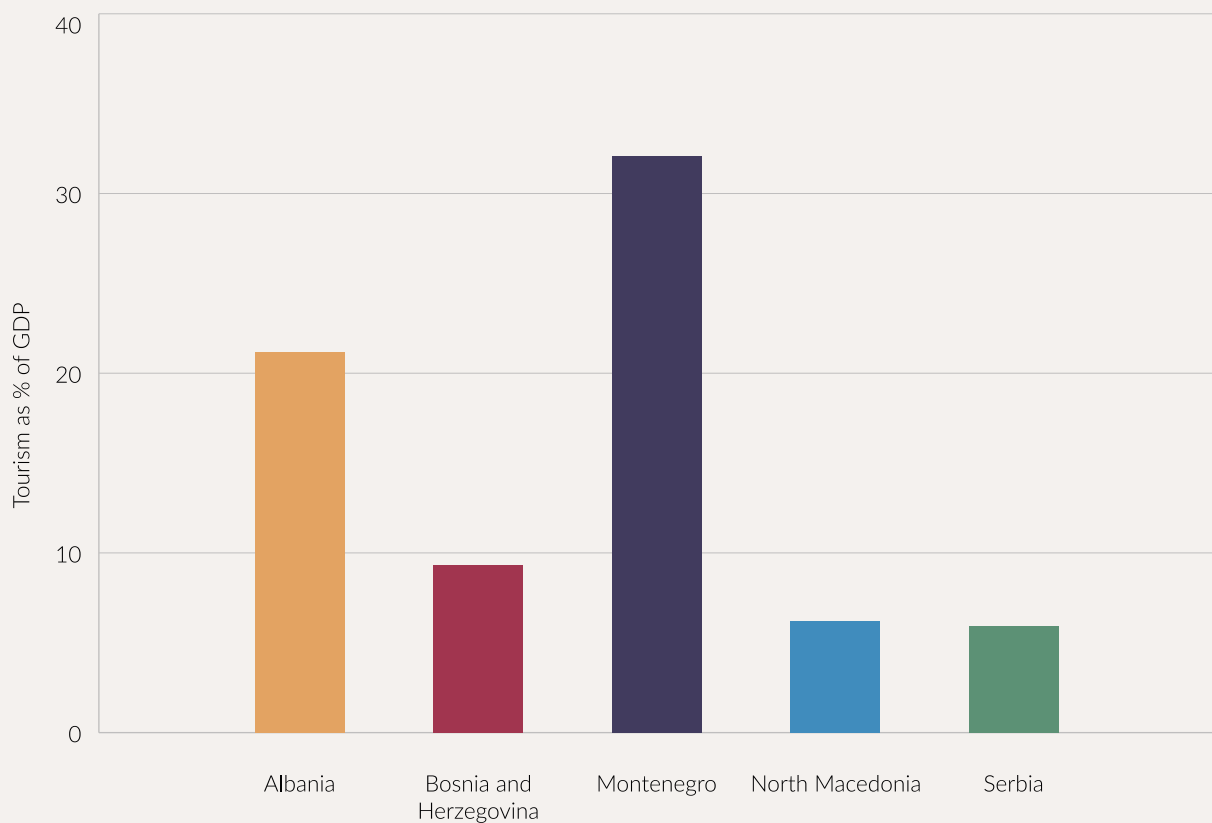


FIGURE 7 Tourism as percentage of GDP.

NOTE: No data provided for Kosovo.

SOURCE: World Travel and Tourism Council, Economic Impact Reports for Albania, Bosnia and Herzegovina, Montenegro, North Macedonia and Serbia, 2020 annual research: key highlights, <https://wttc.org/Research/Economic-Impact>.

Across the WB6, weak regulation of tourism (including the emergence of informal tourist services), low capacity of law enforcement tasked with ensuring child protection and a lack of expertise on CSEC in the travel and tourism industry have increased the risk of sexual exploitation of children. Many NGOs across the region have observed a disturbing trend in recent years. They report that exploitation frequently occurs in the hotel industry and have pointed to the increased risks during the summer, especially along the Adriatic coast.⁴⁴

There is little data or information on the prevalence of SECTT in the Western Balkans, as the issue is not frequently reported on or dealt with in local media, the travel and tourism industry or by the criminal justice system. Part of the problem is that SECTT is not defined as a separate crime in the criminal codes of the WB6 countries, so no official cases were recorded by the responsible law enforcement agencies or dealt with in local courts in recent years. This finding is the result of a review of the applicable criminal codes of Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia and an examination of available human trafficking statistics. As will be described below, SECTT is usually handled as human trafficking in general or as 'child abuse'. However, representatives of public institutions consulted for the purpose of this report confirmed that they have observed a rising number of cases, especially over the vacation season in summer.⁴⁵



FIGURE 8 Key holiday and exploitation locations across the WB6.

NOTE: The figure provides insights into regional distribution but is not exhaustive. Interviewees did not mention hotspots specific to sexual exploitation of children in the travel and tourism sector in Kosovo.



SECTT appears to be closely linked to internal child trafficking patterns as a form of trafficking of children for the purpose of sexual exploitation. However, it not only has ties to the hotel industry, but also to bars, restaurants, tour and event operators and, more widely, transportation companies. In addition, it includes incidents such as the infamous ‘David Brown case’ in 2008, where a UK citizen ran an orphanage in Tirana, Albania, but was found guilty of sexually abusing the children that stayed there.⁴⁶ It is assumed that several other international travellers who had come to visit the orphanage were also involved.⁴⁷ While this case is over 10 years old, it typifies wider issues relating to SECTT, namely the vulnerability of different types of organizations to foreign travellers arriving as volunteers. Many institutions that work with volunteers fail to make background checks, institute child protection policies or provide appropriate training for volunteers, creating opportunities for travelling child sex offenders to easily access children.⁴⁸ In this context, the impact of seasonal workers is also closely monitored for its impact on SECTT in Montenegro.⁴⁹

▲ A booming tourism industry in the Western Balkans has posed a risk for the sexual exploitation of children. Above, one of Albania's most popular tourist destinations, in Durres.
© Besart Cani

Child marriage

The Office of the High Commissioner for Human Rights defines child marriage as a marriage where at least one of the parties is under 18 years of age and describes it as a form of forced marriage: i.e., when one or both parties have not personally expressed their full and free consent to the union.⁵⁰

According to the United Nations International Children's Emergency Fund (UNICEF), around 650 million women alive today were married as children across the globe; the total number of girls married in childhood is currently estimated at 12 million a year.⁵¹ Also, while South Asia has seen a significant reduction in child marriage cases over the past decade, the global burden has shifted to sub-Saharan African countries, which currently witness dramatically high rates.⁵²

*Different forms
of exploitation
progressively
characterize the lives
of Roma children.*

In the Western Balkans, child marriage is particularly widespread among minorities, particularly in Roma communities.⁵³ Experts explain that parents and influential community members arrange marriages as early as possible to avoid illegitimate pregnancy and the public shame that this would entail.⁵⁴ In addition, when the marriage is organized with grooms from abroad, intermediaries from other Roma communities are involved.⁵⁵ There are also reports of children themselves seeking to get married at an early age, which gives insight into how deeply rooted this phenomenon is among Roma communities.⁵⁶

Another key element of child marriage is the monetary compensation for the family of the girl. All interviewees confirmed that there cannot be a marriage without a financial benefit for the family and, once sold, the girl usually cuts all ties with her parents and family.⁵⁷ To give an idea of the amount of money involved, from the report of a court case held in Banja Luka, Bosnia and Herzegovina, in 2020, a father sold his 13-year-old daughter for 2 300 KAM (€1 180) to two adult men who then sexually abused her.⁵⁸

Many Roma girls are forced into marriage within their own community or other Roma communities across the region. For instance, there are reports of Roma girls from northern Albania being forcefully married into communities from North Macedonia or Kosovo and Roma girls from Kosovo being married against their will into Roma communities in Montenegro.⁵⁹ Similar patterns were also observed with Roma communities in Serbia, Bosnia and Herzegovina and Romania.⁶⁰

Field research has shown extreme and perpetual exploitation dynamics: reportedly, in North Macedonia a Roma girl was forcibly married four times and gave birth to an unknown number of children.⁶¹ In other cases, it emerged how different forms of exploitation progressively characterize the lives of Roma children: originally exploited for forced begging or shoe polishing, many Roma children have in fact reportedly been subjected to commercial sexual exploitation in bars, brothels and strip clubs⁶².

Figure 9 illustrates patterns that emerged during the research, showing how exploiters deceive Roma children and how, through false promises, children are induced into different forms of exploitation, often organized by criminal networks.

For instance, Roma children in North Macedonia are reportedly forced into exploitative jobs through verbal and physical abuse or through the imposition of narcotic substances.⁶³ In Montenegro, the exploitation of Roma children is so well organized that begging and child marriage constitute a temporary introduction to more severe commercial sexual exploitation at a later stage.⁶⁴

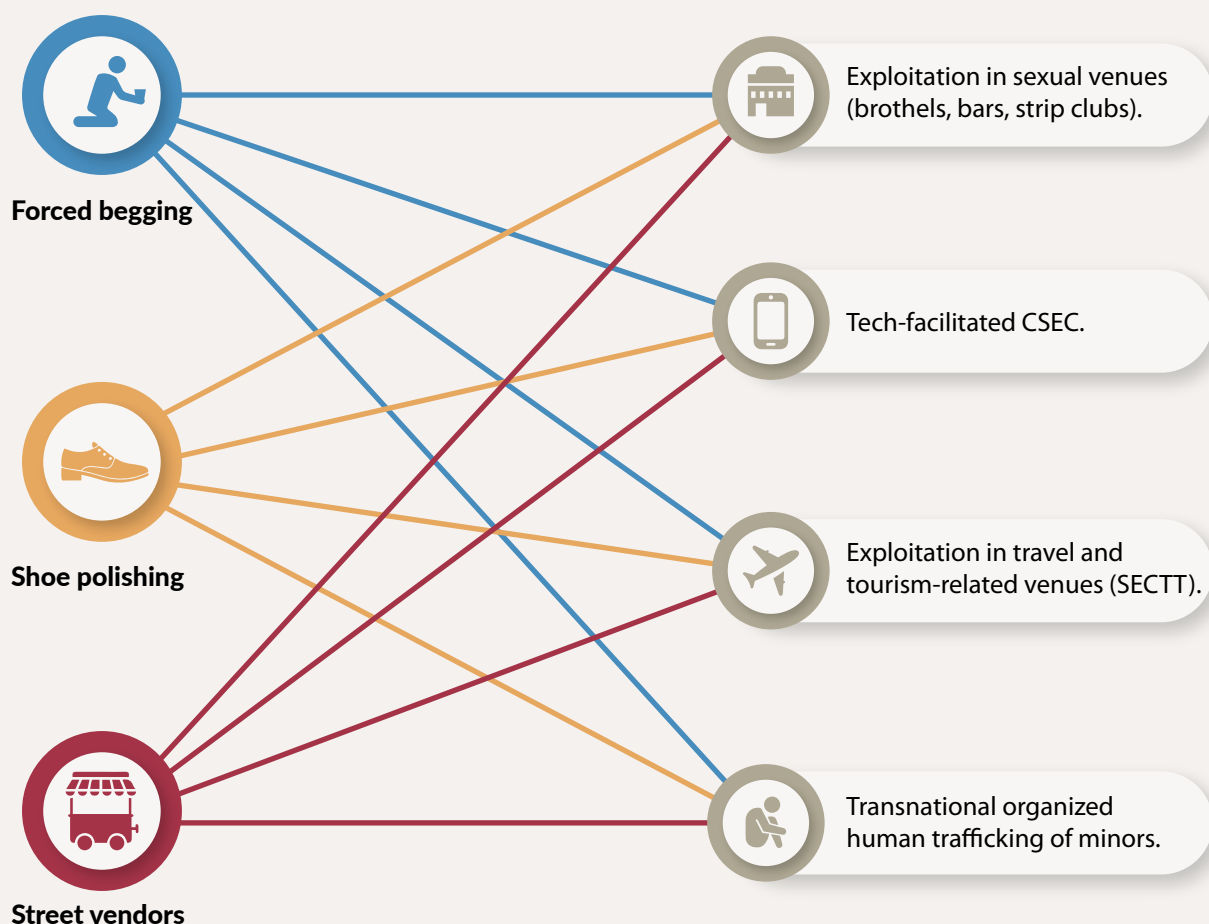


FIGURE 9 Interconnected forms of exploitation in the WB6.

NOTE: Research on child marriage constantly exposed overlaps and connections between labour-related forms of exploitation and CSEC, as well as among different forms of CSEC.

While most of the exploitation is occurring within the region, there are also reports of Roma children being trafficked to Western Europe (France, Italy and Germany), where they are forced into marriage with grooms from the local Roma communities.⁶⁵ In 2015, the ‘Hamidovic case’ attracted particular attention when law enforcement authorities from Bosnia and Herzegovina and France, together with the European Union Agency for Criminal Justice Cooperation, discovered a transnational human trafficking network operating from Paris. Hamidovic, a Bosnian national, was found guilty of exploiting more than 500 (mostly Roma) girls and women who were trafficked from Bosnia and Herzegovina to France and forced into begging, pickpocketing and sex work.⁶⁶ In some cases, child marriages had previously been arranged to circumvent border controls and to ensure the successful trafficking of the girls to France.⁶⁷

There are indications that CSEC of Roma children is also moving online. In 2017, a case involving a European citizen showed how Roma girls in small urban areas in the north of Serbia were first lured with promises of fake jobs in the fashion industry and then became the subjects of child sexual abuse materials sold online.⁶⁸ As described below, this is part of a wider trend towards tech-facilitated CSEC in the WB6.

Tech-facilitated CSEC

While only limited data is available on tech-facilitated CSEC at the national level in the WB6, NGO representatives from the region indicate that the problem is growing in their countries.

Tech-facilitated CSEC usually starts with grooming (establishing a relationship with a minor victim), then 'sexting' (creating and/or sharing sexually suggestive images of the victim), sextortion (blackmailing the child victim with their own images to extort sexual favours or money) or live sexual abuse (coercing a child into sexual activities) and CSAM sexualized materials depicting children.

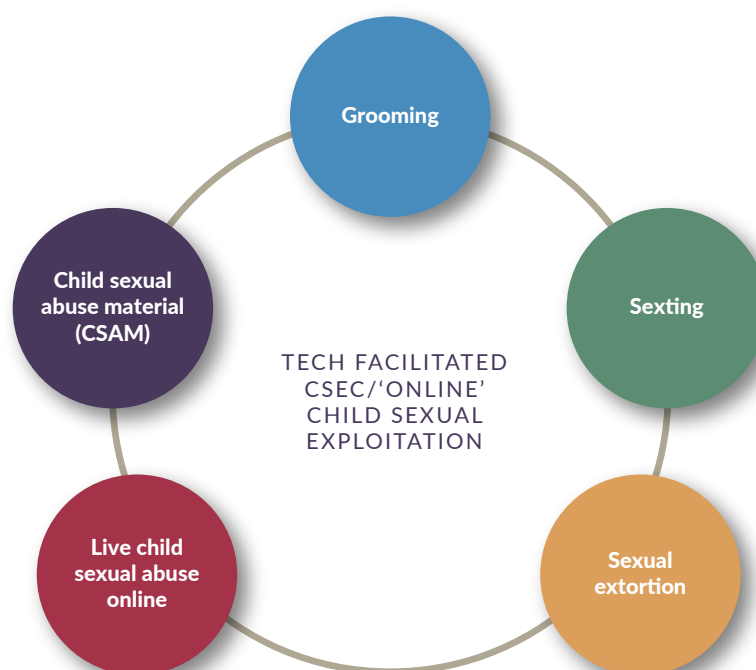


FIGURE 10 Stages and elements of online CSEC.

SOURCE: ECPAT International, Online child sexual exploitation: A common understanding, May 2017, https://www.ecpat.org/wp-content/uploads/2017/05/SECO-Booklet_ebook-1.pdf.

According to a UNICEF study from 2020, the Cybercrime Unit in Albania has received between 5 000 and 20 000 referrals a year from international partners such as INTERPOL, EUROPOL and the NCMEC, indicating possession, distribution, production and use of CSAM.⁶⁹ NCMEC alone referred 6 300 cases of indecent images of children from January to October 2019, with an average of 200 users accessing and sharing abusive material.⁷⁰

In Albania, one in four children reported having at least one contact online with someone who they had never met face-to-face before and almost two in 10 reported meeting someone in person who they had previously known only on the web; one in ten children reported at least one unwanted sexual experience through the internet.⁷¹



FIGURE 11 The Albanian domain .al

SOURCE: Sibti Ali et al, The lost cases: Findings and recommendations from an in-depth assessment of gaps in the investigation of online child sexual abuse cases in Albania, UNICEF Albania, August 2020, <https://www.unicef.org/albania/media/3361/file/The%20lost%20Cases.pdf>.

Research conducted in 2016 by Save the Children North West Balkans and the NGO Criminal Policy Research Centre on the behavioural attitudes of children, parents and teachers online in Bosnia and Herzegovina has shown alarming results: 48.5% of children received messages from unknown people on the internet; one in four children (23.1%) responded to such messages and one in ten children (11.4%) said they would agree to meet (in real life) the person they had spoken to online.⁷² Statistical records of judicial institutions show an emerging trend of online child sexual abuse.⁷³ Furthermore, 117 criminal offences in the field of high-tech crime were reported in the Republic of Srpska (Bosnia and Herzegovina) in 2019, 67 more offences than in 2018. Child exploitation for pornographic and sexual purposes is among the most common offences.⁷⁴

The Serbian National Contact Centre for Child Safety on the Internet received 19 500 communications (phone calls, emails, etc.) about potential misuse of the internet involving children between 2015 and 2019. Furthermore, every third pupil in Serbia reportedly had some disturbing online experience in the prior year, according to the country's 2019 UNICEF Online Survey on Internet and Digital Technology Use among Children and Youth.⁷⁵ The police have had some success in cracking down on this crime, however. In 2019, through 'Operation Armageddon', more than 15 terabytes of abusive material were seized, over 200 criminal charges were filed and dozens of people were arrested in the UK, the US and other countries.⁷⁶

The real number of tech-facilitated CSEC cases may be significantly higher than those reported or identified.

In North Macedonia, on the mobile app Telegram, a group of more than 7 000 users was created in early 2020 with the aim of sharing abusive material of teenage and young women.⁷⁷ There is no data on the action taken against the perpetrators, although the administrators of the social media group were known to law enforcement. Similar cases were also reported in Serbia in March 2021, where several offenders were arrested for sharing pornographic materials involving children and were given sentences of up to ten years in prison.⁷⁸

In Montenegro, a UNICEF survey reported that 29% of children, or about 20 000 children, stated that they had seen pictures on the internet with obvious sexual content.⁷⁹

Since the ability of law enforcement agencies to detect tech-facilitated CSEC is still in its infancy and there are few reporting mechanisms and no systematic monitoring of trends, it is thought that the real number of cases may be significantly higher than reported or identified cases.

Online harassment and cyber-enabled crimes

One important segment that requires joint intervention in the Western Balkan region is that of the online gaming and messaging platforms which have been identified as a channel for various threat vectors affecting children from privacy, abuse up to manipulation and radicalization.

As pointed out by a cybercrime expert at the Macedonian association of corporate security, the two most common forms of harassment in online gaming are doxxing and swatting. Doxxing is when one or more online participants seek personal, identifying information on a particular user for blackmail or intimidation purposes. Doxxing can often lead to the release of real names, phone numbers, home addresses, employer information and more. Swatting is a form of harassment that uses doxxing techniques to create an actual, tangible threat. A harasser will call in a threat to a doxxed user's local law enforcement, often claiming there is a kidnapping or hostage situation at the victim's address, to intimidate, blackmail and exert control over the victim.

Profile of the children at risk

There is little data related to the number of children exploited or their age groups, but the data suggests that children vulnerable to CSEC across the Western Balkans – be it online, in travel and tourism or for child marriage – share a similar profile. Indeed, interviewees – both from government and civil society – stated that the risk factors are mostly related to the socio-economic family circumstances of a child (poverty and high unemployment, low level of education, social exclusion, history of abuse/alcoholism, etc.), lack of engagement and prevention from the child protection and social care system, as well as a lack of access to information about CSEC in the community.⁸⁰

Information from North Macedonia shows that the children most vulnerable to CSEC/SECTT are girls and that the majority of victims are aged between 13 and 17.⁸¹ The majority have been trafficked domestically for commercial sexual exploitation and forced labour in restaurants, bars, hostels, motels on the highways, nightclubs and low-profile accommodations outside of cities frequented by locals and travellers.⁸² Although no comprehensive studies are available for the other WB6 countries, experts consulted for this report confirmed that they have observed similar patterns in other countries across the region. Researchers emphasized that the vulnerability of boys to CSEC is not to be underestimated,⁸³ which seems to align with the general literature on CSEC.

The NGO sector also identified some characteristics specifically concerning victims of online exploitation. While in Albania tech-facilitated CSEC mainly affects adolescents (aged 11–17), in North Macedonia NGOs report that younger children are also at risk, considering their increasing internet use and the fact that children are going online at an early age. Girls in Albania and North Macedonia were also identified as being at higher risk of becoming victims of tech-facilitated CSEC. Interviews carried out in Bosnia and Herzegovina and North Macedonia suggest that victims are carefully selected according to various risk factors in their physical and mental health and poor social skills which makes them more open to suggestion and manipulation.

▼ A Roma family in Belgrade, Serbia. © Vladimir Zivojinovic



The majority of Roma children live in overcrowded homes lacking adequate potable water, electricity, heating and sanitation.

Roma vulnerabilities

Roma children are particularly vulnerable to commercial sexual exploitation. Already in 2014, for instance, the European Commission issued a report on SECTT looking specifically at the vulnerabilities recognized and faced by Roma children on the move in Kosovo. The report revealed how some children were forced to move between Albania and North Macedonia, usually during the summer, or between Albania and Kosovo in summer and winter.⁸⁴ However, reports on Roma children and CSEC in the Western Balkans by either international or non-governmental organizations are rare. The ones that do exist are often outdated – as is specific demographic data on Roma communities.⁸⁵

All WB6 countries have a significant Roma population, ranging from around six to eight thousand people in Albania and Montenegro to almost 150 000 in Serbia.⁸⁶ The estimation of the size of the Roma community across the Western Balkans is challenging, since many live in informal settlements with limited access to infrastructure and sanitation facilities. For example, in Albania, less than 50% of all Roma households have access to piped water.⁸⁷ Formalization of these settlements has been slow and many Roma communities continue to live as closed-off groups, with little access to the formal economy or government services. In Kosovo, for example, only 10% of Roma over the age of 16 are reported to have access to health insurance.⁸⁸

The preservation of their language and nomadic or semi-nomadic habits, coupled with their marginalization in separate settlements has led to the persistence of stereotypes around their way of living and their culture, language and traditions, which has made their integration into local societies more difficult.⁸⁹

Exclusion, prejudice and discrimination affect the lives and opportunities of the Roma community on a daily basis, in particular those of Roma children, whose school enrolment rates continue to be low. In Serbia, for example, less than 4% of Roma children are enrolled in pre-school education; only half of those enrolled in the first grade reach the fifth grade.⁹⁰ In neighbouring Bosnia and Herzegovina, only 2% of Roma children aged three to five are enrolled in education programs.⁹¹ Similar statistics are also available from the World Bank, which show that two out of five Roma children receive poor-quality education in a segregated school and that only one in three complete secondary school. In addition, the majority of Roma children live in overcrowded homes lacking adequate potable water, electricity, heating and sanitation.⁹²

These low levels of education and social mobility make many Roma children vulnerable to various forms of exploitation – both within the community and by organized criminal networks operating in the Western Balkans and beyond. Previous research and articles in the media have often focused on Roma children being exploited in forced begging and pickpocketing.⁹³ Children (primarily boys) are often trafficked from suburban to urban areas for the purpose of begging in the streets.⁹⁴ For example, in Tirana, Albania, hundreds of children are estimated to make a living out of begging, selling items in the streets and shoe-polishing.⁹⁵ However, there have also been reports of male children living on the streets being vulnerable to sexual exploitation in nightclubs as both dancers and for sex work.⁹⁶

Emerging trends

High risk of children on the move becoming vulnerable to CSEC: Since the 'refugee crisis' of 2015–2016, the Balkan route has been a prominent path for migrants and refugees heading towards Western Europe. As described in a recent report by the Global Initiative Against Transnational Organized Crime, both adults and unaccompanied minors have been travelling through two main corridors: the 'central corridor' which leads from Greece through North Macedonia, Kosovo and Serbia to Hungary and a 'western corridor', which runs along the Adriatic Sea coast through Albania, Montenegro and Bosnia and Herzegovina to Croatia.

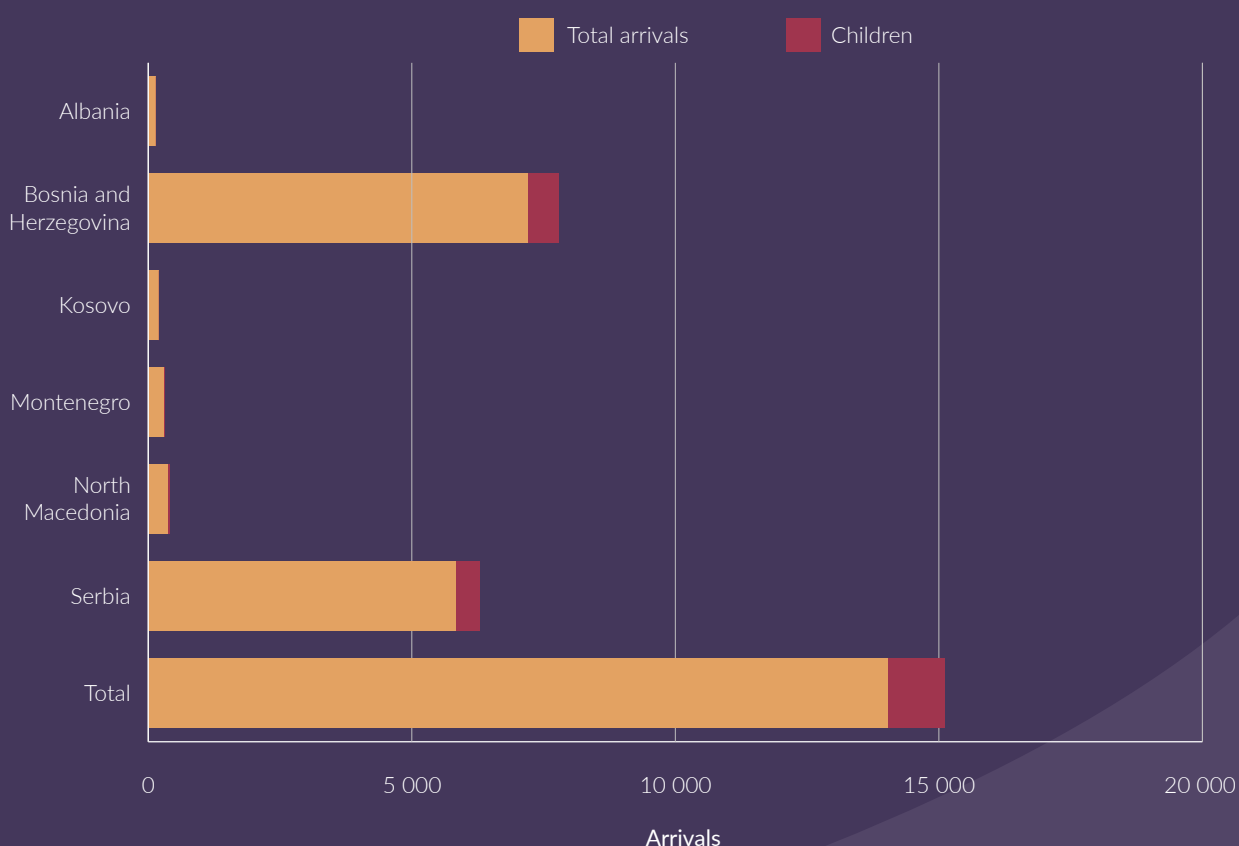


FIGURE 12 Arrivals in the WB6 as of end of 2019.

SOURCE: UNHCR, Western Balkans – Refugees, asylum-seekers and other mixed movements, <https://data2.unhcr.org/en/documents/download/73832>.

Although official numbers of unaccompanied minors are relatively low, evidence suggests that the true number is considerably higher than the one reflected in official statistics, especially given that a significant number of minors choose to declare themselves as older than 18 years of age to avoid being separated from the other migrants.⁹⁷

Across the region, the large increase in undocumented migrants in a relatively short period of time has caused significant pressure on administrative and reception capacities, meaning that the basic needs of migrants are often not met. In addition to critical hygienic conditions and lack of access to primary healthcare – problems which most migrants have to deal with – minors also face severe safety and security risks, including the risk of becoming a victim of human trafficking.⁹⁸ Although more than 100 reports were filed by potential victims of human trafficking in Serbia between 2013 and 2019, only eight were identified as such, with no disaggregated information available on gender or age.⁹⁹

Data compiled in Serbia by the Centre for the Protection of Victims of Trafficking showed 40 presumed victims in 2016, but only two victims of trafficking were formally identified. Both were female: an Afghani girl trafficked for labour exploitation and child marriage and a Nepalese woman trafficked for sexual exploitation. In 2017, 14 cases of presumed victims of trafficking among migrants were identified, of which only one – an Afghani boy who was a victim of sexual exploitation – was formally identified as a trafficking case.¹⁰⁰ There are also cases of 'Bacha bāzī', so-called 'dancing boys', mainly from Afghanistan, who have been abused by other migrants in reception centres along the Balkan route.¹⁰¹

Civil society organizations have also reported the practice of survival sex, that is the provision of sexual services in exchange for food, a place to sleep or other basic needs.¹⁰² A representative of the Centre for Victims protection in Serbia described the phenomenon in an interview: 'These are mostly children who are trying to help their families or are alone. Once there was a girl who was sexually abused in Turkey, Greece and Serbia. Traffickers waited for her in Turkey, where she was employed as a nanny, as agreed, but also forced to do sex work'.¹⁰³

By looking at the statistics, it may seem that these are isolated cases. However, it is suspected that the phenomenon is largely underreported, especially given the difficulties associated with identifying migrant children in the first place. Due to migrants' short stays in reception centres and the fact that reports are not usually filed by the victims themselves for fear of being repatriated (testimonies come from their peers, fellow travellers or migrants who occupy the role of 'wardens' in the reception centres), it is difficult to identify and monitor patterns of exploitation.

Profile of the perpetrators

Global literature on CSEC previously categorized offenders into two main groups: the traffickers, those whose primary purpose is to recruit and exert control over victims and exploit them for monetary gain; and the purchasers of CSEC.¹⁰⁴ Globally, reports indicate that traffickers are primarily men.¹⁰⁵ In several cases, women who were previously victims of trafficking later became recruiters. They were motivated by a desire to stop being victimized themselves and to gain protection or favour from the perpetrators.¹⁰⁶ Traffickers reportedly share several risk factors with CSEC victims, including having been former victims of physical or drug abuse, family violence and having disadvantaged social, educational and economic backgrounds.¹⁰⁷ However, given the lack of research and court data available on this topic which could serve as a basis for analysis in the Western Balkans, there is no common profile of the perpetrators involved in CSEC in the region.¹⁰⁸

Concerning the purchasers, research emphasizes the importance of social and cultural values and beliefs, as opposed to individual factors alone.¹⁰⁹ Reports have shown that most men who purchase sex do not significantly differ from those who do not.¹¹⁰ Some purchasers reportedly did not know if they were buying the services or materials from minors, while others willingly ignored such a possibility.¹¹¹ Already in 2016, ECPAT warned that CSEC (especially in the travel and tourism sector) was becoming invisible, shifting to indoor locations such as brothels, clubs, hotels and guesthouses in urban, rural and coastal settings. While some perpetrators continued to approach children on the street, recruitment of children for SECTT in Europe was increasingly shifting online, thereby allowing perpetrators to reduce their visibility and risk of arrest.¹¹² This has also been confirmed by many civil society and law enforcement representatives who have noted the sophistication of the individuals and criminal networks involved in its organization.¹¹³

According to ECPAT, expatriates and other extended-stay residents constitute a significant proportion of the offender population involved in SECTT in European destinations. Globalization of the labour market and frequent cross-border travel for work and tourism, now constitute an important source of the demand fuelling SECTT.¹¹⁴ While in the Western Balkans it is often argued that SECTT occurs only in isolated cases and regional data remains limited, it is important to note that several foreigners have indeed been arrested in the region for various crimes related to sexual exploitation of children (e.g. a UK citizen in Albania in 2008,¹¹⁵ an Israeli arrested in Pristina in 2019¹¹⁶ and an Albanian arrested in North Macedonia in 2017–2018¹¹⁷).

Globally, traffickers are primarily men. In several cases, women who were previously victims of trafficking later became recruiters.

Concerning tech-facilitated CSEC, NGO representatives from Albania stated that offenders are often people known to the victims. Bosnian NGO representatives believe that some of the offenders could have post-traumatic experiences or other disorders, such as problems with impulse control. In North Macedonia, reported perpetrators are usually middle-aged adults (from 25 to about 55 years old) who are digitally literate and have access to a computer. While some are 'lonely young men', quite frequently the perpetrators are people who have their own families and children.

Another interesting phenomenon reported by Albanian police officers and legal psychologists that offer child counselling in the commissariats was that of 'reverse abuse'. Exploited children, mostly young girls, were forced to offer sexual favours in exchange for money and other goods. The girls pretended to be older than 18 years old. If the men they contacted refused to engage further, they were then blackmailed with intimate videos and photos of their illegal actions with minors. The exploiter thus became the victim. In Montenegro, foreign female perpetrators reportedly groom children online for the purpose of sexual exploitation and sextortion.

COVID-19 impact

Although it is still too early to estimate the impact of COVID-19 on CSEC, it has no doubt increased the vulnerability of children to tech-enabled sexual exploitation. School closures forced children into the digital sphere unprepared, without adequate knowledge of how the digital sphere works or what risks it entails. Online gaming and chat groups became key meeting places for interactions among children, thus raising the risk of CSEC. Indeed, since early 2020 there has been a rapid increase in digitalization of society at all levels.

There is not yet any reliable global data (let alone in the Western Balkan countries) on the extent of children affected by increased internet use, given that research is still ongoing. However, EUROPOL¹¹⁸ and INTERPOL¹¹⁹ report that government-imposed restrictions affected trends and threats of commercial sexual exploitation offences across the world. They observed a spike in demand for child trafficking for online sexual exploitation and distribution of online child sexual exploitation material in many parts of Europe as more predators and potential perpetrators were confined at home.

According to the EUROPOL report, many CSAM indicators became more visible, such as an increased number of attempts to access illicit websites and forums containing child sexual exploitation material, activity on P2P networks, referrals from the NCMEC and the number of reports made by the public to law enforcement and other institutions.¹²⁰ Online gaming, chat groups, phishing email attempts, contact through social networks and educational applications became the main places for encounters between children and sex offenders. Unsupervised time online also increased the risk that underage individuals could produce and distribute self-generated indecent material. In fact, experts from EUROPOL predict that there will be a sharp increase in the amount of self-produced indecent material in 2021, which could lead to a corresponding increase in online solicitation and exploitation.¹²¹



But the COVID-19 pandemic has also had a significant impact on 'offline' CSEC and the prevention and prosecution of cases. Indeed, it is likely that vulnerable individuals who had previously been marginalized due to gender, ethnicity or migration status, are now experiencing even more alienation, uncertainty and discrimination than before the pandemic. In addition, many who were previously not in the high-risk group might now be more vulnerable to CSEC due to increased time online, higher unemployment and the fact that many informal sources of income have become unavailable during COVID-19.¹²² Although the number of international tourists dropped significantly in summer and winter 2020, domestic travel often continued unchecked, especially during the summer.¹²³

Identification of victims has also been hampered by lockdowns. Although shelters remained officially open, many victims were not able to visit them personally but could only reach them on the phone.¹²⁴ Experts reported that their SOS hotlines received more calls during the COVID-19 crisis than in previous years; in Serbia, for instance, the number of calls more than doubled in comparison to 2019.

Many governments have also shifted their priorities over the last year away from the already-limited focus on the prevention and detection of CSEC towards pandemic responses, policies and measures. Indeed, in the WB6, no specific measures were taken by governments to address the increased vulnerability of children to CSEC because of COVID-19.¹²⁵ There is an urgent need for all stakeholders to develop preventive actions and plans and put in place effective mitigation strategies and measures, particularly before tourism restarts.

▲ The COVID-19 pandemic has increased the time children spend online, making them more vulnerable to tech-enabled sexual exploitation.


© Bahrudin Bandić

A woman with a yellow and black checkered scarf is sitting at a white table, interacting with two children. One child, a boy in a grey jacket, is standing and pointing at a mural of Goku. The other child, a girl in a red hoodie, is sitting on a green chair. The background features colorful murals of a toucan, a fairy, and a sign that says "DISTANCIAMI SOCIAL STOP".

CHILD PROTECTION SYSTEM AND RESPONSES

Countries in the region have established child protection systems and legislative frameworks, but these suffer from a lack of resources and systematic implementation.

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Having examined the Western Balkans' specific social, economic and political situations, as well as the different forms of CSEC that are present in the region, it is important to understand which responses are currently in place to help identify challenges and gaps in effectively addressing the phenomenon. The following section examines the region's child protection infrastructure – the national system ensuring the safeguarding of children from any form of violence, abuse or exploitation, and laid out through a range of laws, policies, regulations and services across all social sectors. Since coordination of responsibilities of the child protection system are spread across governmental agencies, such as law enforcement bodies, judiciary and social welfare actors, and implemented by service providers, such as local authorities and specialized civil society organizations, the chapter below focuses specifically on the activities and initiatives of these actors.

Summary

- All countries except for Kosovo have signed important international and regional legal frameworks, conventions and protocols addressing CSEC of the WB6 countries.
- On a national level, elements of child sexual abuse as offense are mostly distributed through WB6 criminal code articles but not all countries have separate criminal offences related to child prostitution.
- Although national legal frameworks comply with international standards, there appears to be neither a coherent multi-stakeholder approach nor sufficient availability of resources to counter and reduce children's vulnerability to sexual exploitation in the WB6.
- All countries have national referral mechanisms in place to facilitate the reporting and processing of suspected trafficking cases for sexual and labour exploitation.

- Systematic implementation of child protection responsibilities across the administrative levels, as well as limited financial, human and technical resources remains a challenge. Another challenge is the lack of coordinated operationalization of targeted Action Plans between the stakeholder groups including the sharing and updating of information.
- Law enforcement agencies have varying degrees of expertise on tech-facilitated sexual exploitation and SECTT. Nevertheless, a need for targeted capacity building for judiciary and law enforcement personnel was raised across the WB6 countries.
- One of the main challenges for child protection NGOs dealing with tech-facilitated CSEC is the lack of cooperation with police and limited data sharing of law enforcement agencies.
- There is limited protection and assistance to children on the move and children from ethnic minority communities, especially in regard to provision of accommodation and re-integration for Roma children.
- In all countries, besides Bosnia and Herzegovina, information and communication technology (ICT) companies claim to have dedicated staff working on the reports of inappropriate and illegal content.
- Local travel and the tourism industry are not sufficiently prepared to identify, report and prevent SECTT.

Legal framework

There are several international and regional frameworks, conventions and protocols addressing CSEC, including tech-facilitated CSEC criminal activities. Most notable and relevant to the WB6 countries are: the UN Convention on the Rights of the Child (CRC);¹²⁶ the UN Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Pornography; the UN Convention against Transnational Organized Crime (UNTOC) and the Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children; the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse (the Lanzarote Convention);¹²⁷ the Council of Europe Convention on Cybercrime (the Budapest Convention);¹²⁸ Resolutions 1099 (1996) and 1307 (2002) of the Parliamentary Assembly of the Council of Europe on the sexual exploitation of children; and Directive 2011/93/EU of the European Parliament and of the Council of 13 December 2011 on combating the sexual abuse and sexual exploitation of children and child pornography.¹²⁹ These documents represent international and EU-wide standards in combating tech-facilitated abuse and exploitation of children that have had an impact on relevant national legislation.

Figure 13 looks at the Western Balkan countries' ratification status and/or compliance progress regarding some of the above-mentioned international and European legal frameworks, conventions and protocols addressing CSEC, including tech-facilitated CSEC criminal activities (for more details, see Annex II).

Obligations from specific act	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia
UN CRC	Ratified on 27 February 1992	Ratified on 1 September 1993	–	Ratified on 23 October 2006	Ratified on 2 December 1993	Ratified on 12 March 2001
UN CRC-OP-SC	Ratified on 5 February 2008	Ratified on 4 September 2002	–	Ratified on 23 October 2006	Ratified on 17 Oct 2003	Ratified on 10 October 2002
UNTOC	Ratified on 21 August 2002	Ratified on 24 April 2002	–	Ratified on 23 October 2006	Ratified on 12 January 2005	Ratified on 6 September 2001
Palermo Protocol	Ratified on 21 August 2002	Ratified on 24 April 2002	–	Succession on 23 October 2006	Ratified on 12 January 2005	Ratified on 6 September 2001
Council of Europe Lanzarote	Ratified on 14 April 2009	Ratified on 14 November 2021	–	Ratified on 25 November 2020	Ratified on 11 June 2012	Ratified on 29 July 2010
Council of Europe Budapest	Ratified on 20 June 2002	Ratified on 19 May 2006	–	Ratified on 3 March 2010	Ratified on 15 September 2004	Ratified on 14 April 2009
EU Directive 2011/92130	–	–	–	–	–	–

FIGURE 13 Ratification status of key international and regional legal frameworks, conventions and protocols addressing CSEC by the WB6.

All countries except for Kosovo have ratified important international and regional legal frameworks, conventions and protocols addressing CSEC in the WB6 countries. On a national level, most elements derived from international instruments on child sexual abuse are included in WB6 criminal code articles but are also located in family laws and cybercrime laws. The protection of the child based on international principles addressing the needs of ethnic minorities is also guaranteed by the countries' constitutions.

Although national legal frameworks seem to comply with international standards, in-depth analysis shows that the WB6 have uneven regional criminal law protection of children. For example, not all countries have separate criminal offences related to 'child prostitution'. All WB6, except for Kosovo, have adequate criminal law provisions for 'grooming' but depending on where the offenses are based, penalties can vary widely. Also, the ISP obligations differ, as they do exist in Serbia, Montenegro and Albania but are absent in Bosnia and Herzegovina, Kosovo.

Terminology

Although the term 'child pornography' is still widely used as a legal definition in many countries, including in the US and many Western Balkan countries, its use is largely misleading and inaccurate. The term 'pornography' is used to refer to materials such as images, videos, books and other media that are intended to cause sexual excitement.

Given that children are not yet mentally or physically mature, they cannot be fully aware of the activities that they might have been coerced into. The involvement of children in such materials should therefore not be defined as pornography, but as 'child sexual abuse or exploitation'. Inaccurate use of terminology can downplay the exploitative nature of the phenomenon, as well as imply some degree of legitimacy from the perpetrator's side and compliance from the child victim's side.

National child protection approaches

National Referral Mechanisms (NRMs) are a crucial component of child protection systems. In the WB6, all countries have such NRMs in place to facilitate the reporting and processing of suspected trafficking cases for sexual and labour exploitation and identifying potential traffickers.¹³¹ For instance, in Bosnia and Herzegovina, a network of specialized police officers and prosecutors was recently established as part of the country's 2020–2023 Strategy for the Suppression of Trafficking in Human Beings.

This network is expected to ensure a more active approach to combating human trafficking and related criminal offences, such as tech-enabled child exploitation, including responsibilities for the planning and implementation of joint operations, coordination, participation in the work of the new coordination structure and support activities of the Task Force.

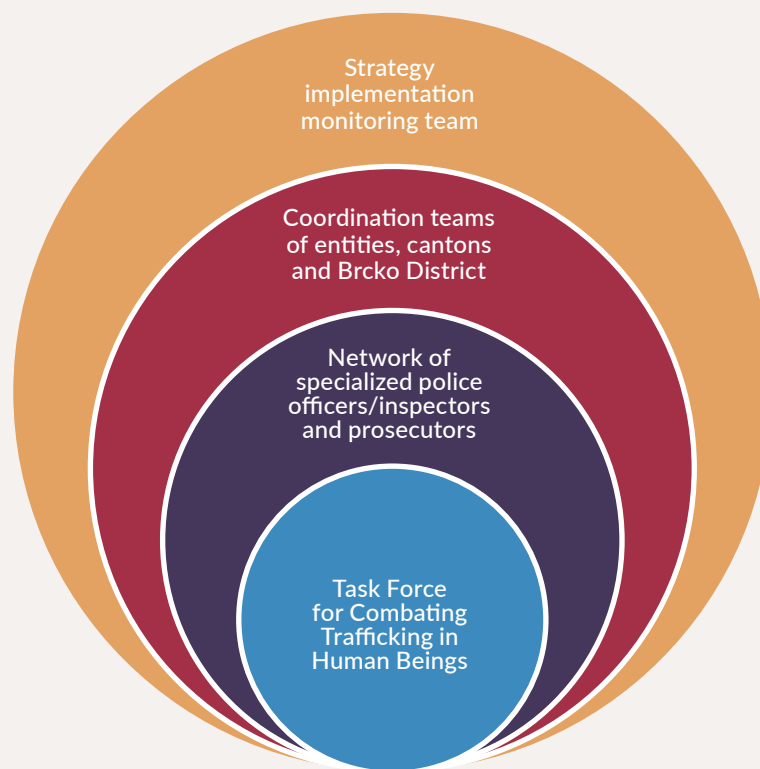


FIGURE 14 Coordination teams in the Bosnia and Herzegovina National Referral Mechanism structure.

In Bosnia and Herzegovina, activities on victim identification have declined since 2012, as have the investigation, prosecution and conviction of trafficking offenders. One reason is that although the necessary legislative and institutional frameworks are in place, implementation across the country is lagging. The Council of Ministers adopted an Action Plan for Child Protection and Prevention of Violence Against Children through Information and Communications Technologies in Bosnia and Herzegovina (2014–2015), designed to foster the development of an efficient mechanism for online child protection and prevention of online child sexual exploitation. However, few of the Action Plan's activities were implemented during the foreseen time period. Although the new Strategy to Suppress Trafficking in Persons 2020–2023 incorporates all the obligations accepted by signing both the Palermo Protocol and the Council of Europe's Convention on Action Against Trafficking in Human Beings, implementation will be key.

In North Macedonia, a national coordination body was established in 2008 to implement the 2009–2012 Action Plan for Prevention and Combating Sexual Abuse of Children and Paedophilia. This body is apparently not functional, however: no available data on its activities was found, nor can the status of implementation of the Action Plan be assessed. The main obstacles remain poor law enforcement; lack of a strategic and systematic approach; and limited financial, human and technical resources and capacity. The North Macedonian Ministry of Interior has set up a so-called Red Button reporting scheme¹³² as well as a website to report crimes related to online child sexual abuse and hate speech.¹³³

In Serbia, the Ministry of Interior's Department for the Suppression of Cybercrime, in cooperation with the Belgrade Higher Public Prosecutor Office's Special Department for the Fight against Cybercrime, has been conducting operation Armageddon, a permanent police action begun in 2010. The aim is to combat the sexual exploitation of children and minors on the internet, as well as other forms of digital violence against minors. Furthermore, the government developed a strategy for the fight against cybercrime for the period 2019–2023, which envisages special activities and tasks to protect children in Serbia from trafficking and exploitation for pornography and prostitution.¹³⁴

In Montenegro, UNICEF supported the establishment in 2015 of a cybercrime unit within the police directorate by providing training for employees and buying software for its operation. This unit works specifically on criminal offences related to child pornography and stalking.

All WB6 countries have established child protection systems and put legislative frameworks in place. However, systematic implementation across the administrative levels and limited financial, human and technical resources remain a challenge. Civil society and law enforcement representatives additionally reported a lack of coordinated implementation, including timely information sharing, of targeted action plans by the stakeholder groups.

Systematic implementation and limited financial, human and technical resources remain a challenge in the region.

Standard operating procedures for tech-facilitated CSEC investigations

The 2018 'Assessment report on obtaining and using electronic records in criminal proceedings under domestic legislation in South-eastern Europe and Turkey'¹³⁵ indicates that there is no unified procedure for the examination of digital evidence in the Western Balkans, although there is a great deal of similarity in terms of language and law, especially in the countries of the former Yugoslavia.

For child sexual abuse material, very often the only clues that exist to identify the victim and catch the perpetrator are precisely the videos or images stored on the electronic device. Proper examination of digital evidence and devices is necessary to preserve the evidence for the prosecution or indictment of the crime. Establishing a protocol for the examination of digital evidence is key to the success of an indictment, as detailed by the US Department of Justice in 'Forensic examination of digital evidence: A guide for law enforcement'.¹³⁶ However, only Kosovo has specialized police protocols for dealing with digital evidence in cases of tech-facilitated CSEC.

In Albania there is a procedural structure for investigating and tackling each reported case of tech-facilitated CSEC. The information is transferred from the police officers to the prosecutors and the cybercrime unit for further investigation. If the police require more detailed information regarding IP addresses or internet connections, the prosecutor's office authorizes the request while the cybercrime unit leads the process.

It is often very difficult to properly determine the IP address of the offender, its credentials or the IP network from which the connection was made. In Albania, many ISPs provide only one GPON (Gigabit Passive Optical Network) per area, making it difficult to track specific IPs. Even though there are tools that can help ISPs track and locate the correct address, most of these tools do not exist in Albania and such types of investigations are not pursued.



FIGURE 15 Procedural structure for case investigations in the Albanian police.

As for SECTT, no child protection action plan in the region specifically addresses this phenomenon. Only in Montenegro does the 2019–2024 anti-trafficking strategy recognize the challenges for human trafficking posed by large tourist resorts and the influx of one million tourists a year. In Bosnia and Herzegovina and Kosovo, SECTT is not specifically addressed in the human trafficking strategy or the national action plan. In Albania, experts are currently hoping it will be included in the new 2021–2026 Strategy for Child Rights as well as a new strategy addressing child abuse. Although North Macedonia has already agreed to a separate action plan for combating child trafficking, it does not envision any specific activities to address SECTT.

Most WB6 countries are also parties to the UN World Tourism Organization (UNWTO), which in 1999 adopted the Global Code on Ethics in Tourism, a set of principles designed for the development of tourism by governments, the travel industry, communities and tourists.¹³⁷ Although not legally binding, the Code features a voluntary implementation mechanism; a total of 15 companies based in the Western Balkans have signed up to the Code. In addition, the Minister of Trade and Industry in Kosovo (which is not an official party to the UNWTO) signed up to its pledges.¹³⁸

Most countries in the region have signed bilateral agreements with their neighbours on human trafficking.¹³⁹ In addition, in 2007, the Albanian Ministry of Interior and the Ministry of Tourism, Culture, Youth and Sport, signed an agreement with the Organization for Security and Co-operation in Europe that aimed to protect children from sexual exploitation in tourism. However, many of these initiatives have yet to be fully implemented.¹⁴⁰

Systematic monitoring of CSEC trends in the WB6

NGOs from the six countries stated that national data on the prevalence of CSEC is not available. However, anecdotal evidence from UNICEF Serbia indicates that open-source statistics in this field are available.¹⁴¹ Some countries, like Kosovo, lack not only a unified database on online child sexual exploitation but also reporting mechanisms for crimes related to online sexual abuse of children. In Montenegro, experts are concerned about the absence of a unified database. Overall, interviewed experts agree that collection of CSEC data in the Western Balkans is insufficient.

Country	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia
Reliable national statistics	Yes	Not unified, on different state levels	–	No	No	Yes
Open source statistics	Yes	Not unified, on different state levels	–	No	No	Yes
Relevant prevalence rate/ significant research	No	No	–	No	No	Yes

FIGURE 16 Systematic approach to monitoring CSEC trends in the Western Balkans.

Experts working with the Roma community have described a lack of both proactive and reactive investigations, especially when it involves reaching remote locations where Roma communities often live.

Equipment, capacity-building and training

Law enforcement representatives from Albania, Kosovo, Bosnia and Herzegovina and North Macedonia shared that police have equipment and software necessary for collecting, seizing and analysing digital evidence of online exploitation of children. However, Albania does not own equipment to analyze mobile phones, while Montenegro lacks equipment and software for seizure and analysis of evidence collected from personal computers. Police respondents from Kosovo, Bosnia and Herzegovina and North Macedonia stated that their equipment and software is updated and renewed on a regular basis. Regarding capacity for storage of digital evidence, only the police from Kosovo, Montenegro and North Macedonia stated that they have sufficient capacity. Kosovo and North Macedonia mentioned that the police are adequately equipped and trained for tech-facilitated CSEC cases. However, the Macedonian Unit for Cybercrime and Forensic Analysis noted that there is a need for additional training.

Ownership of equipment and related software	Albania, Kosovo, Bosnia and Herzegovina, North Macedonia
Ownership of equipment and related software for analysis of mobile phones	Kosovo, Bosnia and Herzegovina, Montenegro, North Macedonia
Maintenance of equipment and software	Kosovo, Bosnia and Herzegovina, North Macedonia
Existence of specialized protocols	Kosovo
Sufficient capacity for storing digital evidence	Kosovo, Montenegro, North Macedonia

FIGURE 17 Overview of equipment, software, protocols and law enforcement capacity for dealing with tech-facilitated CSEC.

Concerning the number of staff working on tech-facilitated CSEC cases, police officers in Albania, Montenegro, North Macedonia, Bosnia and Herzegovina and Serbia stated that there are not enough police officers dealing with these kinds of cases.

Country	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia
Adequate number of staff working on tech-facilitated CSEC cases	No	Partially (not in Federation or Brcko District, yes in Republic of Srpska)	Contradicting information	No	No	Yes
Specialized staff or department for tech-facilitated CSEC cases	No	Partially (not in Federation and B District, yes in Republic of Srpska)	Yes	No	No	No
Training and education for staff working on tech-facilitated CSEC cases	No	Yes	Yes	Yes	No	Partially (by INTERPOL)
Police capacity is adequate	No	No	Yes	No	Yes	No
Judicial capacity is adequate	No		Yes	No	Yes	No

FIGURE 18 Overview of law enforcement officers' capacity and training.

Kosovo and some entities of Bosnia and Herzegovina have specialized departments and staff working on tech-facilitated CSEC cases. Kosovo and Montenegro use specialized court-appointed experts in tech-facilitated CSEC cases, while other countries do not. The head of the Kosovo cybercrime unit argued that they have enough competence and capabilities to deal with these crimes. At the same time, interviews show that the lack of expertise in dealing with this kind of crime within the regional law enforcement agencies is evident. Nevertheless, all law enforcement representatives, except for those from Albania, stated that their staff working on tech-facilitated CSEC cases underwent additional training and education. Only respondents from Albania and Kosovo mentioned the existence of specialized protocols that should be followed for tech-facilitated CSEC cases.

Judicial capacity appears to be problematic: only law enforcement representatives from Montenegro and North Macedonia stated that it is adequate for dealing with tech-facilitated CSEC cases. Experts from Albania, Montenegro and North Macedonia pointed out that there are no prosecutors or judges specialized in dealing with such cases in their countries. However, Montenegrin civil society experts questioned the adequacy of capacities for judicial personnel in dealing with tech-facilitated exploitation, since according to prosecutors' knowledge, there were no crimes of child trafficking through use of the internet. In Serbia, although judicial capacity is not considered adequate, there is nevertheless a conducive atmosphere and a willingness to develop capacity.

In Albania, even though there is a cybercrime unit in the Tirana police directorate, the staff are not adequately trained and lack forensic tools and technologies to investigate these offences. The cybersecurity unit has undertaken several, mostly donor-supported, capacity-building programmes on investigation of cases of online child sexual exploitation and abuse, but lacks an in-house system for transferring specialized skills in this area. Prosecutors also report the need for training of IT-related skills, as well as in investigation and prosecution techniques for cases of online child sexual exploitation and abuse. Neither the police nor the prosecution are fully equipped with the proper infrastructure to effectively investigate these cases. The cybersecurity unit is unable to perform website surveillance, hampering their ability to start ex officio and proactive investigations. Afraid that covert operations might be considered as entrapment, the police do not undertake them. This barrier should be addressed through adequate training, standard procedures and technical tools. Lack of rapid response by the ISPs to prosecution requests, as well as difficulties in identifying the IP addresses of alleged offenders, affects the quality of investigation and, consequently, the possibility to hold perpetrators accountable. Until now, there has been no psychological or psychosocial services or support offered. These are vital to help professionals who work on the issue deal with the mental stress and physical burnout related to the horrendous nature of the crimes.

When it comes to SECTT, there is little awareness among law enforcement officials across the Western Balkans on the current prevalence and trends and personnel often do not receive regular or specific training.¹⁴² However, Macedonian law enforcement provides an annual training schedule, while law enforcement in Bosnia and Herzegovina and Montenegro receive training specific to SECTT-related projects provided by international NGOs. In Kosovo, law enforcement officers interviewed emphasized that they receive capacity-building sessions on the topic of child abuse, to improve the quality of investigations.¹⁴³ However, several interviewees referred to the fact that guidelines and laws are often unclear and lack implementation. In addition, officials have little expertise in recognizing behavioural patterns of abusers or children who are not accompanied by their legal guardians.¹⁴⁴

Neither the police nor the prosecution are fully equipped with the proper infrastructure to effectively investigate cases of child sexual exploitation and abuse.

Intersectoral cooperation between child protection stakeholders

Regulatory frameworks and targeted policies often lag technological innovations. Policymakers should ensure a more proactive processing of child trafficking and related criminal offences, including delineation of responsibilities on the planning and implementation of joint operations and coordination. To close these gaps, various stakeholder groups, including law enforcement, businesses and civil society organizations, must come together to develop technological innovations against various forms of human trafficking.

Law enforcement respondents from Montenegro interviewed for this report informed that due to the lack of NGOs focusing on tech-enabled child exploitation, there is no cooperation between civil society and law enforcement on this issue. In contrast, police from Albania, Kosovo, North Macedonia and Bosnia and Herzegovina confirmed that cooperation with NGOs has been established. A positive example of good cooperation between government institutions in fighting tech-facilitated CSEC is the signing of Protocols of Cooperation between the Safer Internet Centre in Bosnia and Herzegovina and the Federal Police Directorate, Ministry of Interior of Republic of Srpska and Brcko District Police.¹⁴⁵ These Protocols regulate mutual responsibilities and procedures between the Centre and all three police agencies in Bosnia and Herzegovina in receiving CSAM reports, exchanging information, assessing content and submitting reported cases to law enforcement systems. The Protocols aim to advance social childcare and child protection, as well as to ensure necessary aid when a child is exposed to different forms of violence or abuse, through ensuring adequate and timely responses of competent institutions and services. The Protocols also foresee cooperation between the Centre and police agencies regarding the conduct of capacity-building activities for various target groups (children, parents, teachers, professionals, etc.) and other educational and promotional activities of the Centre in Bosnia and Herzegovina.

Country	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia
Cooperation with NGOs	Yes	Yes, hotline/helpline	Yes, hotline/helpline	No	Yes	Yes
Cooperation with EUROPOL/INTERPOL	–	Yes, basic	Yes, basic	Yes	Yes	Yes
Cooperation with ICT sector	Yes	No	Yes	Yes	Yes	Yes
Cooperation between legal staff and prosecutors with police is positive	No	No	No	Yes	Yes	Yes
Cooperation with neighbouring countries and international organizations	Yes	–	Yes	Yes	Yes	Yes

FIGURE 19 Overview on cooperation with NGOs, international organizations and private sector companies and between authorities.

Regarding cooperation with EUROPOL and INTERPOL, Bosnia and Herzegovina and Kosovo have only basic cooperation; Montenegro and North Macedonia have full cooperation with both entities. Serbian police also cooperate with INTERPOL, while prosecutors work together with EuroJust. In addition, all countries except Bosnia and Herzegovina cooperate with ICT companies. In Albania and Montenegro, this cooperation between the ICT sector and other institutions such as EUROPOL, INTERPOL and civil society organizations is regulated by law. Other interlocutors working in the hotel and tourism industry added that they do not receive any information on trends or patterns from the police that would facilitate the identification of possible SECTT cases.¹⁴⁶

Prosecutors from Montenegro, Serbia and North Macedonia rated cooperation with law enforcement positively. Respondents from the other WB6 countries considered working with the police as one of the main problems in dealing with tech-facilitated CSEC cases.

While most law enforcement representatives stated that cooperation with civil society is functioning well, NGO representatives stressed that even when they reported possible cases of SECTT, the police did not adequately process the information. According to one interviewee in Montenegro, despite the fact that the NGO supplied information about the criminal groups involved, 'the police did not initiate any proceedings'.¹⁴⁷ According to Roma experts, cooperation between the individual entities on the national level is very limited; most cases go unreported due to poor control in countries like Kosovo or North Macedonia. In some cases, the perpetrators work in a well-structured network that also involves police corruption so that 'children are simply transferred across the border of Montenegro without a passport, birth certificate, health card or with forged papers that no one checks'.¹⁴⁸

In Albania, child protection workers face challenges due to the lack of knowledge of online safety for children and a lack of basic funding for case management. The limited number of child protection workers and their uneven distribution across the country makes their work even more difficult. Increasing the effectiveness of investigations into, and the fight against, cybercrime is part of the strategic objectives of both the state police and the prosecution office. The police have set up and operate a cybercrime unit specialized in investigating cases of online child sexual exploitation and abuse. However, there is insufficient coordination between this unit and other parts of the child protection system, which could prevent the victim from receiving other services to which they are entitled. The unit does not have procedures to ensure the inclusion of child protection professionals in the investigation.

In Montenegro, during the tourist season police usually conduct raids on bars, nightclubs, commercial sex sites, escort agencies and businesses suspected of illegal employment practices. Yet they do not share the results of these operations with other national entities of the child protection system.¹⁴⁹

With the exception of Bosnia and Herzegovina, all countries confirmed their cooperation with neighbouring countries and international organizations, which they assessed positively.

The limited number of child protection workers and their uneven distribution across the country makes their work even more difficult.

Victim assistance responses for children from Roma communities and children on the move

More attention by all stakeholders is needed to assist children from Roma communities and children on the move. Concerning Roma child victims, experts have explained that even in those cases where Roma children are successfully identified and rescued from their traffickers, they are rarely given proper shelter or adequate psychological assistance. Rehabilitation and thus (re)integration into society is rare. Even when Roma children spend some time in protective structures, they are often sent back to their families and to the same environment which put them at risk of exploitation in the first place.

Sexual exploitation of children and exposure to human trafficking of unaccompanied minors is a key concern for many of the humanitarian organizations operating in the region. These organizations, together with the national authorities, have worked extensively to raise awareness on the vulnerabilities of minors transiting the region. Yet, many recognize the limits of the support they can provide. An interviewee working at a Montenegrin reception centre observed that ‘they [the migrants] have one goal, namely to pass through our country as soon as possible. The timeframe during which they stay here is just too short to identify possible exploitative dynamics. And matters are made worse because we are not able to apply all the standard strategies which are effective in longer periods.’¹⁵⁰ However, despite the time constraints, some red flags can be identified: for instance, a single parent travelling with many children in his/her charge.

Public institutions, international organizations and civil society must work on a more effective preventive approach to speed up the process of identifying minors at risk and providing these children with suitable accommodation in ad hoc centres separated from adults. Additional personnel are also needed in reception centres to provide continuous administrative and psychological support.

Civil society support mechanisms

Many NGOs across the region work as service providers for child victims of human trafficking and sexual exploitation. However, the capacities of NGOs dealing with the phenomenon remain low, meaning that they are not able to provide separate shelters for child and adult victims of sexual exploitation. The existing shelters are often filled beyond their capacity and staff have little expertise on how to identify and deal with potential victims.

In Bosnia and Herzegovina, the establishment of the Safer Internet Centre was completed only in 2018 by the NGO IFS-EMMAUS, with the support of international donors. There has been a general lack of financial support from the government to counter tech-facilitated CSEC activities in the country. This is concerning since there is clearly a need to address these issues. The reporting hotline Sigurno dijete, established in 2010, received a total of 1 140 reports of inappropriate content from between 2010 and 2020, including 137 on CSAM; 127 on cyberbullying, sextortion, sexting and related offences; and 871 inquiries from children, concerned parents and the general public on issues related to risks and safety on the internet (registered as incomplete reports as per INHOPE procedures, as not directly linked to CSAM offences).¹⁵¹

A Montenegrin governmental organization representative mentioned that there is reportedly insufficient staff in the centres for social work, with five or six colleagues responsible for dealing with about 100 active cases at any given time. The first shelter for victims of human trafficking in the country was founded in 2004 and provided accommodation and legal, psychosocial and medical assistance to victims. The shelter was run by experienced activists from the Montenegrin NGO Women's Lobby, and since 2006 its work was fully funded by the government through the office for combating trafficking in human beings. The shelter then came under the competence of the Ministry of Labour and Social Welfare, which refers victims exclusively to licensed service providers. Due to the demanding and expensive licencing procedure for provision of services, this shelter was forced to close in 2019 and transfer its clients to four other licensed shelters. Another shelter exclusively supporting human trafficking victims was founded by the Institute for Social and Educational Policy (ISOP) in December 2019. The Montenegrin Ministry of Labour and Social Welfare selected ISOP as their new civil society partner in their anti-trafficking efforts. However, the US State Department's Trafficking in Persons Report for 2020 criticized the fact that the government did not officially include civil society organizations in victim-identification procedures. The report further singled out the closure of the sole NGO-run shelter and expressed concern about the quality of assistance at the new trafficking shelter.

In North Macedonia, mobile teams were founded by institutions and NGOs in 2018. These teams communicated with 390 people, assisted nine trafficking survivors and identified 104 potential trafficking victims. Child victims were reportedly often placed alongside adults in general reception centres, which are often congested and ill-equipped and lack services that cater specifically to children. In these arrangements, children are exposed to severe security, physical and psychological risks and are increasingly vulnerable to sexual abuse and gender-based violence.¹⁵²

▼ A group conversation of a Bosnian NGO providing assistance to children having suffered any form of violence.

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In Serbia, the Better Internet for Kids portal provides information, guidance and resources on internet safety issues from the joint Insafe-INHOPE network of Safer Internet Centres in Europe and other stakeholders. A national contact centre for child safety on the internet was established in February 2017.¹⁵³ Through this centre, the Ministry of Trade, Tourism and Telecommunications conducts counselling for children, parents, students and teachers, as well as all other citizens, on the benefits and risks of using the internet and safe ways to use new technologies through various activities aimed at raising awareness.

Regionally, the IRIS Network was established in 2013, consisting of over 200 social service providers and organizations from seven countries in the region (the WB6 plus Croatia) which provide support to children, youth, the elderly, victims of violence, people with disabilities and migrants. The IRIS Network aims to strengthen the role of non-profit social service providers in south-east Europe and to ensure that these organizations are recognized as equal partners in the public sector.

The Lanzarote Convention, in particular Articles 11 to 13, describes in detail what mechanisms are needed for effective support of underage victims.¹⁵⁴ Article 12 suggests development of hotlines for reporting illegal material, while Article 13 recommends creating anonymous helplines (internet or telephone) for children and their parents or caretakers, allowing users to call in anonymously and seek advice. In this regard, all countries have an official helpline mechanism – except for Kosovo which did not provide any information to this regard. Serbia and Albania have hotline mechanisms outside the INHOPE network,¹⁵⁵ while Bosnia and Herzegovina has one within the network. According to official data, neither Montenegro nor North Macedonia have any kind of hotline mechanism for reporting of illegal or inappropriate content.

Country	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia
INHOPE member hotline ¹⁵⁶	No	Yes	No	No	No	No
Hotline outside INHOPE	Yes	No	No	No	No	Yes ¹⁵⁷
Child helpline international member helpline ¹⁵⁸	Yes	Yes	No	Yes	Yes	Yes

FIGURE 20 Overview of the status of hotlines and helplines in interviewed countries.

With regard to SECTT, there are individual positive initiatives from civil society to counter this phenomenon, such as the International Platform against Child Sex Tourism,¹⁵⁹ which allows individuals to report suspected sexual exploitation of children, even from abroad, by using links to the national online reporting mechanisms. In countries where there are no national mechanisms for reporting, this website provides alternative information on how to report. The website also provides information on the sexual exploitation of children in the context of travel and tourism. Five organizations based in the WB6 are members of this platform.¹⁶⁰

NGOs are also at the forefront of raising awareness on SECTT across the Western Balkans, including in schools where CSEC is still not part of the curriculum. Unlike global initiatives like the Shiva Foundation,¹⁶¹ there are currently no known initiatives that bring NGOs together with private companies to tackle the problem of child exploitation in travel and tourism in Kosovo.¹⁶²

Private sector companies can play a key role in mitigating the risk of CSEC.

The private sector

The private sector is a crucial stakeholder in the child protection system as actor in enabling as well as in combating the different aspects of child sexual exploitation. By complying with industry regulations, global best practices and self-imposed due diligence standards, private sector companies can play a key role in mitigating the risk of CSEC. The chapter below looks specifically at the role of the ICT and tech industry as well as the hospitality industry to counter CSEC and shows that the private sector is also often the first to recognize new trends and can therefore provide important information to government institutions.

ICT and the tech industry

Addressing CSEC – and the technologies misused to facilitate it – requires coordinated efforts from relevant stakeholders: policymakers who introduce safeguarding regulations, law enforcement officials who oversee implementation, the private sector which works on countering and preventing the misuse of their technologies and digital platforms and civil society organizations which act as watchdogs and help raise awareness among the general public. Within the business community, the ICT and tech sector is uniquely placed to provide innovative solutions for vulnerable communities, survivors, anti-trafficking actors and policymakers, and can also help the business community leverage existing tools to address human trafficking.

In North Macedonia, although strategic documents such as the 2018–2022 National Cyber Security Strategy and Action Plan were adopted in 2018, the tech sector played only a small role in the consultation and implementation process. The Chamber of Commerce for Information and Communication Technologies (MASIT) does not address the issue of tech-facilitated CSEC, nor is it involved in content removal or reporting mechanisms.¹⁶³ Telecom Macedonia stated that the company follows Deutsche Telecom's current standards,¹⁶⁴ meaning that there is no proactive monitoring, removal or reporting of online content. There are no obligatory content removal procedures for ISPs, which act only upon the request of the public prosecutors and deliver data to the Ministry of Interior's Sector for Cybercrime and Forensic Analysis for further processing.

In Serbia, most ISPs and all mobile companies have detailed preventive instructions for child protection on their websites. They also offer parents the technical ability to control what content the child may access. However, there is a lack of transparent information and guidelines on the necessary procedures when abuse occurs. Companies reportedly have to balance between protecting the privacy of their clients and their obligation to report abuse.

Figures 21 and 22 show the results of interviews with ICT companies.

Analysis of reports of inappropriate and illegal content	Albania, Serbia, Kosovo, Montenegro, North Macedonia
Education and training for staff that works on reports	Albania, Serbia
Automated screening technology for inappropriate content	North Macedonia
Anonymous reporting of inappropriate content	Albania, Serbia, Kosovo
Prevention programmes	Albania, Serbia, Montenegro, North Macedonia

FIGURE 21 Overview of ICT companies' staff and their capacity.

Regarding ICT companies' staff and their capacity, respondents from all countries except Bosnia and Herzegovina stated that they have staff working on the reports of inappropriate or illegal content. However, only ICT company employees from Albania and Serbia have received additional education and training to handle such reports. Regarding automated screening technology, only ICT employees from North Macedonia reported using this technology. On anonymous reporting of inappropriate content, respondents from Albania, Serbia and Kosovo stated that they have enabled this function on their websites. Furthermore, all respondents except for those from Kosovo and Bosnia and Herzegovina confirmed that they have participated in programmes to prevent tech-facilitated CSEC.

When the ICT companies' employees were asked about implementation of laws regarding the ICT sector's responsibilities in tech-facilitated CSEC cases, staff from Albania, Kosovo and North Macedonia confirmed the existence of relevant laws and regulations, while respondents from Montenegro and Serbia stated that these laws are not available in their countries. ICT company employees from Bosnia and Herzegovina did not answer this question. Kosovo, North Macedonia and Serbia confirmed that specialized protocols for tech-facilitated CSEC cases are in place. Interviewees from all countries except for Bosnia and Herzegovina confirmed their company's cooperation with other organizations and institutions (mostly governmental and law enforcement agencies). For more details, see Figure 22.

Country	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia
Implementation of laws regarding ICT responsibilities in tech-facilitated CSEC cases	Yes	–	Yes	Yes	Yes	No
Existence of specialized protocols for tech-facilitated CSEC cases	–	No	Yes	–	Yes	Yes
Cooperation with government/civil society organizations and institutions	Yes	No	Yes	Yes	Partially	Yes

FIGURE 22 Overview of ICT companies' implementation of laws, existence of protocols and cooperation.

Travel companies, hotels and the tourism industry

Tourist magazines in Serbia present the country as a destination with 'great and cheap nightlife, as well as beautiful girls'.¹⁶⁵ Experts have warned that these types of advertisements could attract potential SECTT perpetrators and that the local travel and tourism industry is not sufficiently prepared to identify, report and prevent SECTT.¹⁶⁶

Indeed, there appears to be a big discrepancy between the level of preparedness and knowledge of SECTT among smaller businesses and privately-owned hotels and some of the larger hotel chains operating across the region. The former expressed limited knowledge of SECTT and the appropriate procedures to respond to suspected cases. One manager of a small hotel interviewed in Albania had to google SECTT as it was the first time she had heard of the topic. Another interviewee in Bosnia and Herzegovina expressed his frustration, saying: 'There is no knowledge on victim identification and referral and there are no procedures in this regard, except for verbal instructions to staff that the police should be called if a child is suspected to be involved in the provision of sexual services to paying customers'.¹⁶⁷ Hotel staff in Albania also raised concerns that they did not have specific procedures on how to verify that children who stayed overnight at the hotel stayed with their legal guardians.¹⁶⁸

Internationally, the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism (the Code) is a multi-stakeholder initiative to provide awareness, tools and support to companies in the tourism industry to prevent the sexual exploitation of children. The Code aims to reinforce the commitment of companies operating in the industry to join the fight against child trafficking and abuse. Those who pledge to follow it commit themselves to providing regular training to hotel staff, introducing clauses on CSEC in contracts with their suppliers, providing information to hotel guests and publicly renouncing CSEC.¹⁶⁹ Figure 23 shows which stakeholders in the WB6 have committed themselves to the Code.

Country	Tourism companies registered	Signatories to the Code
Albania	1 326 registered accommodation facilities in Albania in 2018. ¹⁷⁰ 1 259 registered travel agencies (including tour operators, etc.) in Albania in 2019. ¹⁷¹	Seven international travel and tourism companies with operations also in Albania are members of the Code. No travel and tourism companies based in Albania are signatories. On the website, only two international companies are listed.
Bosnia and Herzegovina	In December 2020, 62 licensed travel companies and 190 accommodation facilities were registered in the Republic of Srpska. ¹⁷² There were 512 registered accommodation facilities in the Canton of Sarajevo at the end of 2019. ¹⁷³	No signatories to the Code. The Code (or a reference to it) is also not available on any government website.
Kosovo	490 accommodation businesses registered in Kosovo in 2016. ¹⁷⁴	No data available. When interviewed, the Kosovo Tourism Union and the Kosovo Hospitality and Tourism Chamber were not aware of the Code.
Montenegro	248 travel organizers and 94 travel agencies and/or intermediaries are registered. ¹⁷⁵	Two signatories according to the website. However, more than 200 signatories are mentioned in a paper by the Council of Europe. ¹⁷⁶
North Macedonia	1 132 accommodation businesses registered in North Macedonia in 2010. ¹⁷⁷ In 2016, 571 travel agencies were registered. ¹⁷⁸	No signatories listed online. No further information available.
Serbia	1 259 travel agencies were registered in 2018. ¹⁷⁹	Two signatories.

FIGURE 23 Signatories to the Code in the WB6.

SOURCE: The information was retrieved, among others, on the Code website and national statistical offices.

The sporadic implementation of the Code even among local subsidiaries of international hotel chains has led to limited knowledge on SECTT. For example, hotel staff working at some of the largest hotels in Pristina, Kosovo, stated that they did not have any knowledge of industry-specific responses, best practices or initiatives to respond appropriately to SECTT.¹⁸⁰

Hotels in the Western Balkans are not obliged by law to have specific guidelines or protocols to respond to SECTT. As one interviewee explained: 'As long as you follow the law, responses to prevention of SECTT are dependent on the individual effort of the manager or other hotel staff. Our company does not have precisely defined procedures, but since most of our sector managers have experience working in international hotel chains, we respect and use the good practices from the region and beyond.'¹⁸¹ A colleague of his from Serbia also provided insight into his experience: 'At one of my previous jobs at a private hotel in Belgrade, I recognized – thanks to my experience gained in the West – that one of our guests, a foreign citizen, booked a presidential apartment for 20 days and received visits from boys and young men aged 17–20 twice a day. He sexually exploited them and we reported the case to the police, who told us that there was nothing they could do if everything was done on a voluntary basis. The only thing we could do was to refuse to extend his stay with the explanation that the apartment was no longer available.'¹⁸²

The situation is somewhat different in a select number of international hotel chains which have their own internal instructions and protocols for dealing with SECTT. For example, Marriott International reportedly provides compulsory training modules on the identification and prevention of human trafficking for sexual exploitation to all staff. The company has also issued a guidebook that includes information on awareness raising and responses to human trafficking.¹⁸³ In addition to reporting suspected cases to local authorities in the country, they also require their employees to report internally. Procurement processes are subject to detailed supplier screening.

Similarly, the Accor Hotels Group created the so-called WATCH programme - We Act Together for Children. The programme was officially launched in 2014 and is aimed at preventing and reacting as quickly as possible in suspected SECTT cases.¹⁸⁴ Accor Hotels North Macedonia officially signed the Code in 2019 as a result of close cooperation with the local NGO Open Gate – La Strada Macedonia and the National Commission for Prevention of Trafficking in Human Beings and Illegal Migration. Training was made mandatory for all employees and held in June and July 2019.¹⁸⁵ Due to COVID-19, no further activities could be organized in 2020 or are planned thus far in 2021.¹⁸⁶ Accor employees also emphasized the importance of the WATCH programme and the Code in their daily work.¹⁸⁷

Although only a few cases of SECTT were reported by hotel staff in Serbia and Montenegro in the past years, several experts interviewed for this report noted that there had been previous incidents – even under their watch.¹⁸⁸ A hotel employee in Serbia explained that following trainings such as ‘the Code’s e-learning module’, the hotel reported a bump in the identification of criminal perpetrators, as well as increased action by hotel staff.¹⁸⁹ He said: ‘The warning signs of those phenomena can be subtle, but they can be spotted if hotel employees know where to look. They are the small details when a guest uses multiple cell phones or credit cards, checking in with little or no luggage, guests who are distrustful of security and may be acting as if they are being watched, etc.’¹⁹⁰

All interviewed experts agree that more attention is needed across the Western Balkans. A representative of the Marriott Hotel in Serbia described it in the following way: ‘If we want to think seriously about Belgrade as a tourist destination, we also have to take it [SECTT] seriously, talk about these issues and act preventively.’¹⁹¹

Although there is no legislation in Albania that criminalizes the organization of travel arrangements that explicitly or implicitly facilitate opportunities for engaging in sexual exploitation with children, this does not mean that a company cannot be held accountable if criminal offences (including CSEC) occur on its behalf or for its benefit.¹⁹² Companies found guilty of an offence under this law may be punished by a fine or through the loss of their legal personality.¹⁹³ So far, in Albania, there have been no indications that this ever happened, but in North Macedonia, the property owned by a catering business was seized in 2015, after the real estate was used to commit CSEC.¹⁹⁴

Other actors in the private sector


Of course, the travel and tourism industry is not limited to hotels. Motels, bed and breakfasts and platforms such as Airbnb are also part of the hospitality industry. In addition, travel agencies, the entertainment industry, boat companies and shipping lines (among others), play a key role in identifying, responding to and preventing SECTT.

Nevertheless, none of the businesses approached outside of the hospitality industry could provide information on how they approach the topic. In Bosnia and Herzegovina, they once again referred to international experiences, which they used as best practice examples.



CONCLUSION

NGOs in the Western Balkans provide information and organize awareness raising campaigns on digital dangers. © Vladimir Zivojinovic



Despite the limited knowledge and awareness of CSEC in the WB6, this report has shown that CSEC takes place in all countries of the region. It has provided an overview of the different manifestations of CSEC, assessed the impact of COVID-19 on the phenomenon and analyzed the perpetrators' role as well as the profile of children vulnerable to CSEC across the region.

The findings of this report might suggest that the number of CSEC cases registered in the WB6 is low. However, the lack of up-to-date and disaggregated data, together with a general tendency to underreport cases, most likely make the numbers presented here a significant underestimate. As has been shown, children face similar risks across the WB6, with ethnic minorities and children from disadvantaged socio-economic backgrounds being particularly exposed. In addition, the 'demand' has also been increasing in recent years, facilitated by the anonymity of the internet and the rise in tourism. And so, while new cases of CSEC, often tech-facilitated through social media or online communication platforms, are regularly uncovered, little follow-up action is taken. Even when victims are identified, institutions, the private sector and civil society often lack the capacity and knowledge to deal with the phenomenon in an effective way.

While this report adds to our knowledge of CSEC across the region and gives us a better understanding of the ecosystem in which exploitation takes place, it also reveals that more information is needed, especially from official sources. In fact, when conducting the interviews for this report, it was striking how little authorities knew or were willing to share. It was also surprising how little is done to combat and prevent CSEC operationally on a daily basis. Part of the reason may be that CSEC, so far, has not been at the centre of attention of law enforcement as other topics (such as drug trafficking and migrant smuggling) attract more votes and provoke more interest nationally and internationally.



▲ Children of Roma families in Belgrade, Serbia, use the services provided by civil society organizations to stay off the streets. © Vladimir Zivojinovic

However, one overall conclusion of this report is that although the numbers might appear low, the current weaknesses in the child protection infrastructure, limited institutional capacity, lack of specialization and engagement by civil society and the low awareness of the private sector, expose the region and make the WB6 vulnerable to CSEC. In fact, these weaknesses, amplified by the low risk of detection and prosecution of perpetrators, provide an open space for criminal actors to expand their activities and for CSEC to flourish.

There is a clear need for greater understanding and capacity in the region to deal with CSEC. Given the region's shared vulnerabilities and the transnational character of the phenomenon, a joint regional approach is required to ensure an effective response. The international donor community can support these efforts, not only by sharing their knowledge and expertise, but also by insisting that more is done to adapt to, implement and comply with already existing international standards and best practices.

On a national level, capacities of all stakeholders need to be increased and a more holistic approach supported. Cooperation and information exchange between government authorities, the private sector and civil society needs to be championed. A full list of recommendations is provided below.

In conclusion, to prevent and respond to CSEC, there is a need for more information and greater coordination nationally and regionally. With COVID-19 further facilitating and deepening many of the vulnerabilities described above, the time to act is now.


▼ A civil society organization based in Bosnia and Herzegovina provides support to children who have suffered violence. © Bahrudin Bandic





TARGETED REGIONAL RECOMMENDATIONS

A child from an impoverished community in Bosnia and Herzegovina, at risk of various forms of exploitation. © Bahrudin Bandić



This report assessed the current weaknesses and vulnerabilities to CSEC across the Western Balkans. Given the clear need for greater understanding and capacity in the region to deal with CSEC, not only nationally but also on a regional level. First and foremost, it is suggested to set up a regional WB6 prevention network to:

- 1.** Enable a virtuous cycle of practice to research and research to practice.
- 2.** Support WB6 work to raise awareness by creating focused media campaigns and training materials.
- 3.** Set up working groups to facilitate the exchange of best practices and work on concrete initiatives to generate tangible results. The working groups could be organized by practice (i.e., by professional background, such as healthcare practitioners, social workers, education practitioners, law enforcement, judicial authorities, prison authorities, policy makers and researchers) and by programme (i.e., by target group).

More detailed recommendations are available below, divided by target group. Country-specific recommendations, also divided by target group, are provided in the following section. As displayed in Figure 24, the legal framework is pivotal to the enforcement and prosecution of CSEC and tech-enabled human trafficking offences. These laws should be reviewed to ensure that they adequately apply to these offences and are in line with international standards as set out in the Lanzarote and Budapest Convention. Such laws include the criminal code, criminal procedure codes, rules of evidence, human trafficking legislation, cybercrime legislation, legislation regulating ISPs (including their data-sharing obligations) and laws relating to covert operations and investigations.

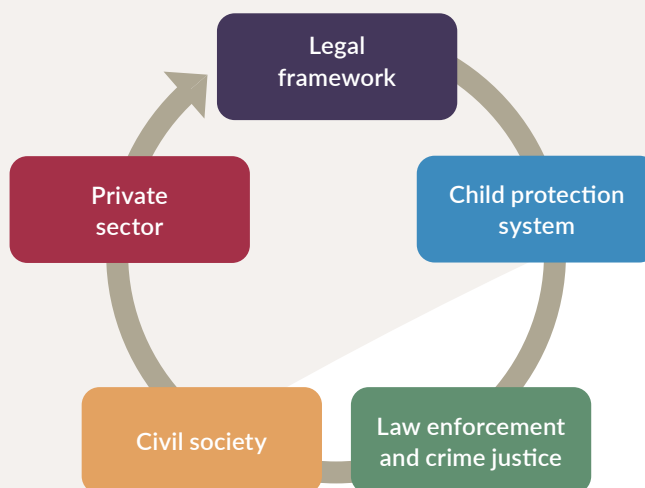


FIGURE 24 CSEC target and stakeholder groups.

Child protection system

The child protection system,¹⁹⁵ through participation of a variety of stakeholders including law enforcement, civil society and the private sector, might face bureaucratic and organizational barriers when it comes to coordinating respective actors working on child protection. The successful design and implementation of concerted operations, efficient data sharing and sustainable transfer of knowledge remain a challenge which requires urgent attention. In detail, it is recommended that:

National strategies be developed for promoting and protecting children's rights.

- Identify a statutory body to oversee the implementation of the Convention on the Rights of the Child, coordinated between local and central levels and providing adequate social care services at the local level (local multidisciplinary teams, health, social, legal, psychological etc), and link the respective national strategies on child protection, human trafficking, education, social inclusion, etc.
- Develop targeted tech-facilitated CSEC and CSEC preventive actions which aim to protect children short- and long-term.
- Complement national strategies with local action plans.
- Engage children, including child victims, in the drafting and implementation process of various national action plans.

Focus on improving data on CSEC.

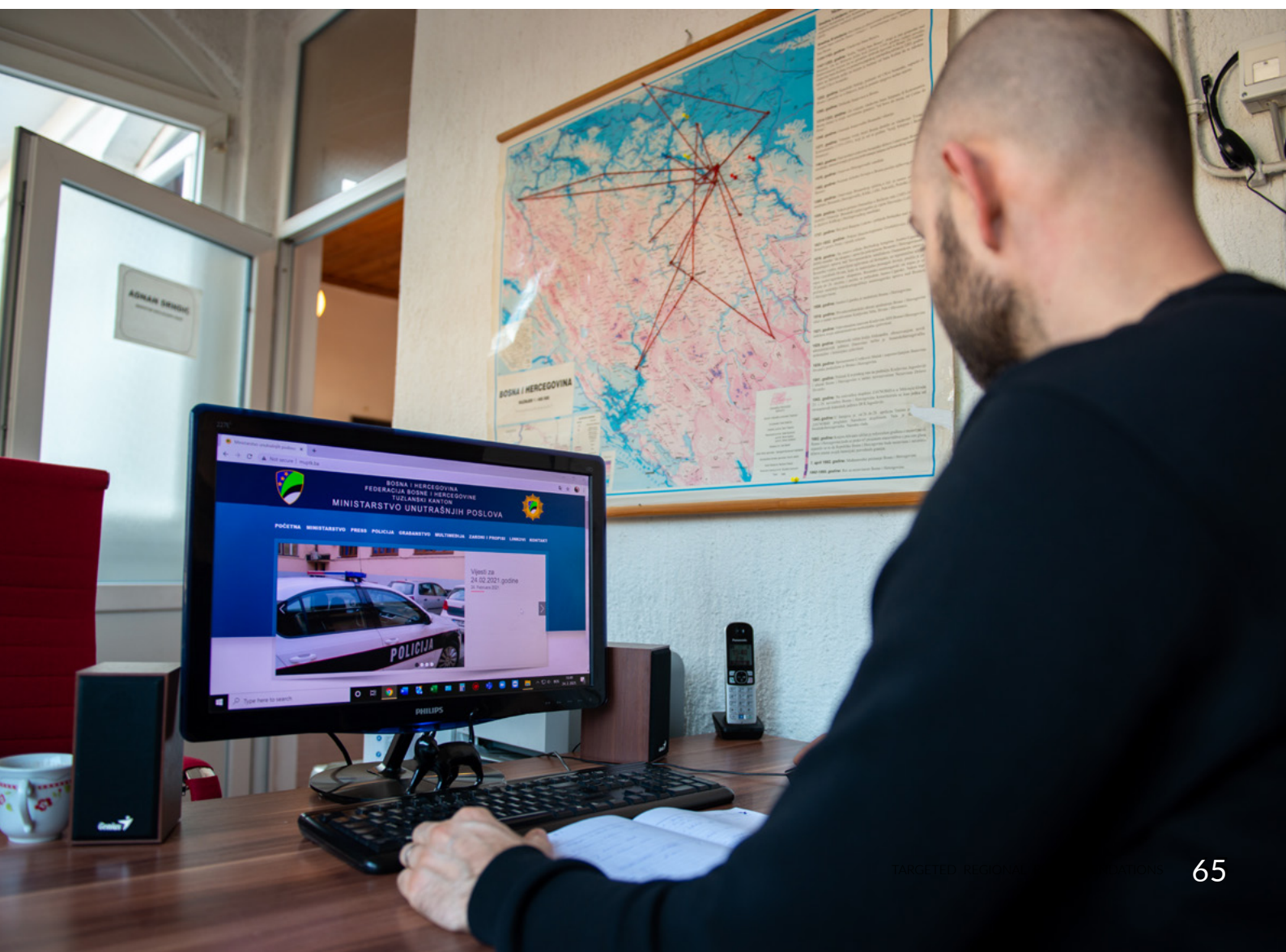
- Launch and fund research gathering data and ensure all stakeholders are involved in updating data.
- Establish a unified database with a developed set of indicators that allow monitoring and analysis (identifying vulnerable categories).
 - Identify one entity as the guardian or owner of this database and first point of contact to access data (metadata).
 - Develop a system of unique case numbers for all involved entities to avoid double entries.
- Regularly publish national statistical reports and share information.
- Use research results to define and create measures of prevention.

- Monitor the number of human trafficking charges, including child trafficking for sexual and labour exploitation, and share data with relevant actors from the child protection system and anti-human trafficking entities.

Enhance a multi-agency coordinating mechanism (outside of the conventional child protection system).

- Include all relevant entities working in the field (especially NGOs and international organizations on the national, regional and international levels, as well as cybercrime units), emphasizing the role of different agencies in responding to the growing need for more information, funding and interventions on CSEC.
- Use the multi-agency coordinating mechanism to develop objective due diligence standards and make these standards mandatory.
 - The EU Digital Services Act presents a key opportunity for setting widely-accepted standards, key to ensuring regulatory frameworks are fit for the purpose of governing the crucial role of ISPs, including in human trafficking markets.
- Work with partners to engage with the financial sector to encourage development of initiatives and tools to tackle the unwitting facilitation of tech-enabled human trafficking and improve the use of financial intelligence to strip assets from offenders.

▼ A social worker in Bosnia and Herzegovina tracks the biggest cases of sexual exploitation of children on a map. © Bahrudin Bandić



- Enhance collaboration with ISPs to monitor and regulate involuntary exposure of children to sexual content online and providing needed data for investigation and assessment.
- Encourage cooperation between various ministries, especially the Ministry of Tourism, the Ministry of Health and Social Protection and the Ministry of Interior to draft and adopt a joint, multi-stakeholder strategy to protect children from sexual exploitation.

While most recommendations are valid to prevent all forms of CSEC, specific focus needs to be put on the protection of minorities. In particular:

- Define special measures for the protection of Roma and migrant children, including specialized teams involving Roma-led CSOs focusing on detection and prevention of forced begging and early or forced marriages.
- Establish reintegration programmes, for national/foreign human trafficking victims after their stay in reception centres.
- Involve Roma representatives in existing framework bodies.

Foster regional cooperation between governments.

- Clearly define responsibilities and sign agreements with NGOs (which should be seen as partners and not service providers).
- Initiate signing of agreements among countries in the region on CSEC and tech-facilitated CSEC.

Establish formal protection and monitoring mechanisms.

- Establish registration schemes to help monitor systems and identify possible child victims of tech-facilitated CSEC and CSEC, especially those who are unaccompanied, to reduce the risk of exploitation.
- Strengthen and financially support helpline and hotline mechanisms for reporting inappropriate content and providing support to victims, ensuring anonymity and the protection of personal data of victims.
- Establish independent grievance mechanisms, e.g. through the office of an Ombudsman.
- Involve representatives of the travel and tourism industry in national referral mechanisms and implementation of existing standard operating procedures.
- Conduct an analysis of the rulebook on licensing services in regard to licensing specialized services for children. Make sure that selected CSOs providing services to victims are adequately funded.
- Ensure victim assistance, such as accommodation, psychosocial and legal help, forensics and any further assistance is tailored for children's needs to enable them to fully recover and reintegrate into their communities.
 - Establish a fund to provide compensation to child victims of human trafficking and sexual exploitation, in cases when such compensation cannot be collected from the perpetrator.
 - Intensify efforts to confiscate assets that were acquired through acts related to trafficking in human beings.



Raise awareness and strengthen expertise.

- Improve and expand school curriculums by including education on digital and internet safety, risk identification and safeguarding behaviours among children and youth.
- Develop information campaigns to inform parents about online safety for children for certain communication channels.
- Implement mandatory training on sexual exploitation and abuse in the virtual space for all personnel, teachers, parents, civilians and volunteers.

Align donor engagement in the WB6 on the topic of CSEC.

- Enhance donor coordination and follow-up capacity-building initiatives (no need for generic training but rather for more specialized modules).
- Support the provision of regional training on CSEC, specifically for cybercrime units, prosecutors and law enforcement personnel instead of targeting individual countries.
- Encourage the WB6 to participate in collaborative EU and international efforts to identify children with Europol's European Cybercrime Centre (EC3) or through the International Child Sexual Exploitation (ICSE) database hosted at INTERPOL.

▲ This child is being assisted by a child protection NGO supporting children in need in Bosnia and Herzegovina.

© Bahrudin Bandić

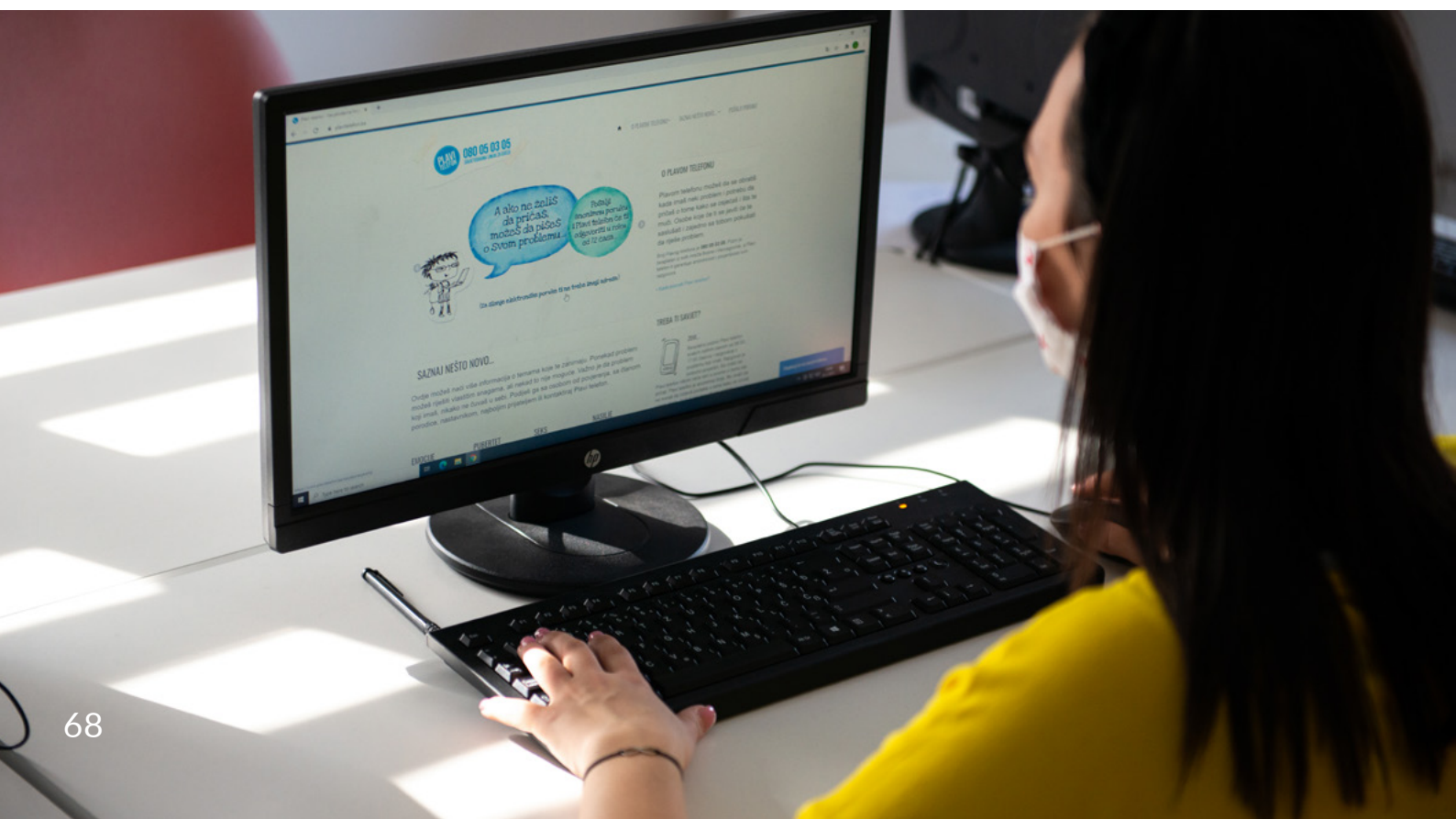
Law enforcement and criminal justice

National law enforcement bodies tasked with investigating and prosecuting CSEC and tech-enabled child trafficking offences largely argued that the existing definitions in their national legislation were sufficiently broad as to apply to the wide range of contexts in which exploitation takes place. Therefore, they did not perceive legislation as a barrier to their operations. However, from an operational perspective, clear mandatory obligations to detect and report on CSEC and tech-enabled exploitation are required to bring more clarity and certainty to the work of both law enforcement and relevant actors in the private sector and tackle online abuse. As specialized expertise is of utmost importance, responses to ensure sustainable and efficient capacity building stand at the forefront of requirements. In detail, it is recommended to:

Increase the training and capacity of police officers, prosecutors (and supporting staff), judges and all relevant actors who have regular contact with children (education, health and social systems).

- Establish a specialized police body for high-tech crimes, with a particular focus on tech-facilitated CSEC. The Ministry of Interior, through the police academy, should establish and provide pertinent and specialized training to build the capability of all relevant officers.
- Focus on the adequate implementation of the Criminal Justice for Children Code and on technical terms (e.g. for tech-facilitated CSEC).
- Develop specialized training curriculums at police academies and centres for education of judges and prosecutors.
- Perform a training needs assessment and establish special annual plans for professional development of all relevant stakeholders included in the prevention and protection system.
- Develop protocols on how to extract abusive material since most of the regional intelligence comes from external sources and expertise (EUROPOL, etc).

▼ A social worker preparing material for awareness raising on online risks for an impoverished community in Bosnia and Herzegovina.
© Bahrudin Bandić



- Ensure that law enforcement officers are properly equipped to handle cases involving CSEC, such as prior experience with children, adequate training, experience with crimes involving children or crimes of a sexual nature, etc.

Foster collaboration between judicial sector entities and child protection systems in investigating cases.

- Improve direct communication lines between police officers, prosecutors and cybercrime unit laboratories.
- Organize regular joint meetings for law enforcement and prosecution representatives on national and regional levels.
- Strengthen cooperation with the labour inspection, particularly to prevent SECTT.

Provide adequate equipment to law enforcement.

- Regularly update both equipment and any necessary software.
- Reinvest in the structure of the national computer laboratory for better technological tools and means of case investigation.

Civil society: NGOs and international and multilateral organizations

Civil society has been very active in the fight against human trafficking, by providing victim assistance, raising awareness on the issue of human trafficking and advocating for victims' rights. In recent years, civil society has also increasingly established alliances with the private sector across different industries to enhance a more holistic approach to mitigate the risk of child exploitation and trafficking in globalized economies. Also, international policymakers have reiterated the need for consistent inclusion of civil society in the elaboration and implementation of policies to prevent sexual exploitation and sexual abuse of children and to implement internal norms through self-regulation or co-regulation. In detail, it is recommended to:

Strengthen civil society's and the communities' knowledge about CSEC, digital safety and the potential threats to children in the virtual space.

- Facilitate child and youth participation in awareness-raising campaigns and information sharing about the phenomenon.
- Journalists, especially online media and professionals should be educated and trained to provide appropriate information relating to all forms of sexual exploitation and abuse of children, with due respect to protection of personal data and privacy of victims.

Develop the capacities and resilience of civil society.

- Focus on children through peer support systems and education programmes.
- Mobilize financial and human resources to continue the successful example and mechanism of mobile teams in the identification of potential victims.
- Collaborate with other civil society actors, NGOs and ICT companies (specifically ISPs), especially regarding knowledge, information and sharing of good practices.



▲ © Bahrudin Bandić

Expand the services and activities of civil society.

- Make services available and accessible to all children, particularly those in rural and economically- and socially-challenging environments.
- Focus on and develop a long-term, strategic approach to addressing the issue, including conducting follow-up and evaluation of completed projects and programmes.
- Advocate for the regulation of digital safeguards and responsibilities among stakeholders in their respective sectors, including ISPs, parents, educational institutions (such as schools) and law enforcement agencies.
- Support states contributing personnel to peacekeeping operations in establishing anti-CSEC safeguard and reporting protocols, as well as in meticulously and promptly investigating CSEC allegations.

Private sector

There is a lack of state power to compel companies to regulate their responsibilities. Policy action is therefore needed to close jurisdictional gaps in regulatory frameworks. Private sector self-regulation is adhered to in varying degrees.

However, policymakers raise concerns that self-regulation is inefficient in isolation, as there is little oversight or enforcement of voluntary commitments and insufficient predictability, and call for clear regulatory frameworks. In the technology sector, while selected social media platforms have adopted self-regulation to close the gap between national jurisdictions choosing to not intervene in the area, the role of intermediaries remains significantly ungoverned in many contexts. The travel and tourism sector is similarly aware of its role and responsibility, although implementation of sector-specific guidelines remains a challenge. The private sector should proactively prohibit the use of sexualized images and messages involving children in their products and services. This includes the availability and promotion of products intended to sexualize girls at a young age in magazines, movies, computer games, clothing, toys, makeup and other products marketed to both adults and children. Detailed recommendations for specific sectors follow.

Recommendations for the ICT industry:

- Improve their limited liability regime of intermediary service providers, along with the unregulated area of notice and take-down procedures. ICT companies should establish protocols and clear procedures and policies regarding removal of illegal or inappropriate materials from the platforms and services which they provide.
- Establish a mandate to monitor and report illicit contents transmitted through their networks, platforms and/or electronic communication devices and services.
- Collaborate more proactively with local NGOs, especially regarding sharing knowledge, experience and information, raising awareness among ICT employees, safeguards and victim protection mechanisms.

Recommendations for the information and technology industry:

- Ensure that online platforms have enhanced safety and safeguard measures; promote and facilitate child-safety referral services and helplines.
- Invest resources to ensure an adequate number of human moderators to monitor some of the most sensitive categories of content, including child sexual abuse material and exploitation.

Recommendations for the travel and tourism industry:

- Increase capacity building and training on SECTT and CSEC for tour operators.
- Increase tour operators' engagement with the Code.
- Develop operational protocols in safeguarding and identifying victims and reporting cases, and make them mandatory.
- Organize media campaigns, produce videos, TV spots, leaflets, billboards, etc. and make them visible in the tourist facilities.
- Improve cooperation with law enforcement and local NGOs, for example by establishing a reporting protocol to inform the police when employees encounter misconduct or suspicious cases and having local anti-trafficking NGOs conduct employee training.
- International, regional and larger companies are encouraged to provide support and share their safeguard and reporting experiences and protocols with smaller, local companies in the industry.



COUNTRY-SPECIFIC RECOMMENDATIONS

A child protection NGO in Albania, supporting children in street situations, child victims of trafficking, children in conflict and unaccompanied minors. © Besart Cani



Albania

Child protection systems

- Improve data collection methods to gain a better understanding of the scale and scope of tech-facilitated CSEC, which would allow for more targeted prevention and protection approaches. Continue research and data collection to issue national statistical reports on the issue.
- Establish formal protection and monitoring mechanisms, including registration schemes for aid and identify potential child victims, especially unaccompanied children, thereby reducing exploitation risks.
- Enhance of the coordinating mechanism to include all relevant entities working in the field.
- The National Council for the Rights and Protection of the Child should emphasize the role of different agencies in responding to the growing need for more information on, funding for and intervention about CSEC.
- Create specific short- and long-term CSEC prevention and protection actions in the national action plans and strategies.
- Engage children, including child victims, in the drafting and implementation process of various national action plans that affect children and youth.

Tech-facilitated CSEC

- Address the lack of a tech-facilitated CSEC component in the National Action Plan.
- Partner with ISPs and ICT companies to monitor and regulate involuntary exposure of children to sexual content online.
- Establish clear procedures on the cooperation between various institutions and actors on the take-down process for illegal or inappropriate material from the online space.
- Prioritize policies and campaigns informing parents about children's digital safety.
- Establish a coordination mechanism to engage all stakeholders, including police and prosecutors, the main ISPs, the Electronic and Postal Communications Authority (AKEP) and representatives of the justice and child protection systems.
- Further strengthen ISP collaboration with state structures and other stakeholders in providing needed data for investigations and assessments.

SECTT

- The government of Albania, especially at the local level, should develop action plans and take measures to protect children from SECTT, this is particularly important as tourism returns to its high pre-pandemic level.
- Law enforcement agencies and tourism operators should be informed about CSEC and on how to protect children from being exploited.
- More funding should be provided to ensure adequate childcare services, protection, education and related issues at the local level.
- Enhance coordination between local entities and the central government, especially in the framework of the new National Strategy for Child Rights 2021-2025.
- The State Agency for Rights and Protection of the Child must ensure that CSEC survivors are protected and provided with adequate social care services at the local level.
- The Ministry of Tourism, in cooperation with other ministries responsible for child wellbeing like the Ministry of Health and Social Protection and Ministry of Interior should work for the implementation of a common approach (raising awareness for travel and tourism operators, policies for information campaigns, etc.) to protect children from sexual exploitation in the travel and tourism industry.

Law enforcement and criminal justice

- Carry out targeted capacity-building training to help strengthen the effectiveness of police officers, prosecutors, judges and all relevant actors in the field.
- Enhance collaboration between various entities involved in investigating cases and ensure direct communication lines between police officers, prosecutors and the cybercrime unit laboratory.
- Law enforcement agencies should closely cooperate with the child protection system to address the needs of CSEC survivors. For this reason, capacity-building training and workshops should be provided to raise the level of knowledge about the phenomena, pathways for supporting victims while responding to their need for protection.
- Invest in the structure of the National Computer Laboratory for better technological tools and means of case investigation.
- The Ministry of Interior, through the Police Academy, should establish and provide pertinent and specialized training to build the capability of all relevant officers.
- Incorporate child- and victim-sensitive approaches to criminal justice measures taken in response to CSEC, SECTT and CSEC-related offences. These approaches should aim to prevent the child's re-victimization and re-traumatization.
- Ensure that national investigators are properly equipped and trained to handle cases involving CSEC, such as prior experience with children and with crimes of a sexual nature, etc.

Civil society, NGOs and international organizations

- Facilitate child and youth participation in awareness raising campaigns and information sharing over the issue, to increase the effectiveness of targeted prevention efforts and protection responses on tech-facilitated CSEC and CSEC.
- Raise awareness among children and parents, caregivers, and practitioners on CSEC and its manifestations, including tech-facilitated CSEC, as well as on reporting mechanisms to inform law enforcement bodies when CSEC is suspected or has been committed.
- Inform parents, caregivers, guardians and other practitioners of the revised ICT curriculums introduced in public schools to include online safety guidance to school children from grades four through nine.
- Ensure that children who have been subjected to any manifestations of CSEC receive adequate services to enable them to fully recover and reintegrate into their communities.
- Strengthen communities' ability to control and protect children on the internet and enhance their knowledge of the potential digital threats and risks.
- Develop the capacities and resilience of children through peer support systems and education programmes.

Private sector

- ISPs and ICT companies should improve the limited liability regime of intermediary service providers, as well as establish procedures for the identification, notice and removal of illicit CSEC materials.

Bosnia and Herzegovina

Child protection systems

- Establish effective social programmes and structures to ensure the necessary support for victims, their close relatives and guardians. Such programmes need to ensure the protection of personal data of the victims, as well as provide appropriate support to victims and children at risk.
- Strengthen helpline and hotline mechanisms for the reporting of inappropriate content and support to victims, ensuring anonymity and the protection of personal data of the victims.
- Raise awareness of child protection issues and children's rights among personnel who have regular contact with children in education, health, social protection, justice and police, especially in areas related to sports, culture and leisure activities. Equip these professionals with knowledge of CSEC, how to identify it and report to child protection services, as well as how to recognize any situation where they have reasonable grounds to believe that a child is a CSEC victim.
- Improve cooperation between governments and NGOs on CSEC prevention. NGOs should be seen as partners and not service providers.
- Follow and apply good practices from other countries from the region and worldwide.

- Enhance regional cooperation in fighting CSEC and its manifestations, especially regarding: the application of relevant international and regional anti-CSEC instruments; protection and assistance to victims; investigations or court proceedings related to criminal offenses of CSEC and other forms of violence against children in the digital environment.
- Encourage and support cooperation between the competent state authorities, civil society and the private sector to better prevent and combat sexual exploitation and sexual abuse of children.

Law enforcement and criminal justice

- Establish a specialized body tasked with processing high-tech crimes, including tech-facilitated CSEC.
- Increase the number of specialized prosecutors with teams of associates to address the specific crimes of CSEC. The certified professionals should be educated on the processing of this criminal offence and sensitized to treatment of victims, increasing identification and prosecution and would serve as the first point of contact for CSEC offences.
- Educate and train judges, prosecutors and lawyers on children's rights and sexual exploitation and sexual abuse of children.
- Address the lack of professional officers and personnel tasked with the detection, investigation and processing of CSEC cases, due to political appointment of inadequate staff within the prosecutorial and law enforcement agencies.
- Improve information literacy and provide specialized training and education for police officers, prosecutors and judges on processing of digital crimes, specifically in police academies and centres for education of judges and prosecutors.
- Undertake necessary measures to ensure that investigations and criminal proceedings are conducted in the best interests of and with respect for the child's rights, including adopting a protective approach to victims, ensuring that investigations and criminal proceedings do not exacerbate the child's trauma and that criminal justice responses are followed by assistance, where appropriate.
- Define the term 'victim' in the national legislation.
- Ensure that the rights and interests of victims are protected at all times, including their special needs as witnesses, at all stages of the investigation and criminal proceedings. Victims must have access to competent authorities and information on relevant judicial and administrative proceedings, as well as free legal aid and legal representation in court proceedings.

Civil society, NGOs and international organizations

- Integrate mandatory content related to the safety of children in the digital environment in ICT studies and school curriculums.
- Educate children of all ages about all forms of violence and abuse against children, both in the real and virtual world.
- Allocate budgets to fund tech-facilitated CSEC-prevention activities and mechanisms such as the Safer Internet Centre.

Private sector

- Media, especially online media and professionals, should be educated and trained to provide appropriate information relating to all forms of CSEC, with due respect for the protection of personal data and privacy of victims.

KOSOVO

Child protection systems

- Improve the cooperation between state institutions and NGOs, in line with the latest normative international standards.
- Improve all stakeholders' capacity and specialization in addressing CSEC and its manifestations.
- Enhance regional and international cooperation with other state actors to exchange information and good practices.
- Conduct awareness-raising campaigns to inform all stakeholders about CSEC and the risks emanating from children's online activities.
- Inform the general public about CSEC-related legislation, reporting mechanisms and the consequences on the lives of the victims.
- Educate children about the risks and hazards of the digital world.
- Develop safeguards and monitoring mechanisms at local internet cafes.
- Launch and fund centres and institutes that gather data and conduct research on this issue.
- Invest in filtering tools that identify, regulate, block and remove illicit CSEC materials; examples include the National Platform for Safe Internet in Albania which closed 74 CSEC-related websites in 2020.
- Improve national hotlines, especially those reporting illegal CSEC materials on the internet.
- Strengthen institutional cooperation at the national and local levels.
- Establish a national action plan on child protection, including actions addressing children's online activities and vulnerabilities.

Law enforcement and criminal justice

- Improve cooperation with the private sector, especially ISP and ICT companies, in combating tech-facilitated CSEC.
- Provide specialized training for judges, prosecutors and the police on CSEC, especially regarding handling of CSEC cases, digital forensics and child victim protection.

Civil society, NGOs and international organizations

- Train journalists and reporters on CSEC-related topics to improve the operations and the ethical standards of media outlets.

Private sector

- Improve cooperation with law enforcement agencies in combating tech-facilitated CSEC.
- Kosovo-based tour operators and hospitality companies should increase engagement with the Code, a multi-stakeholder initiative to raise awareness and capacity in identifying, reporting and preventing CSEC in the travel and tourism industry.

MONTENEGRO

Child protection systems

- Define special measures for the protection of vulnerable groups, including Roma and migrant children.
- Develop mechanisms for identification of victims.
- Establish permanent cooperation with other security services and adopt a multidisciplinary approach in: prevention, education and treatment, keeping appropriate records in this area and the flow of information between services.
- Strengthen responses to CSEC, including tech-facilitated CSEC, at the municipal level through local multidisciplinary teams.
- Develop specialized services dedicated only to children, for accommodation, psycho-social and legal help, forensics and any further assistance.
- Prioritize and improve the reintegration of victims and the monitoring of potential victims.
- Involve all stakeholders in developing and consistently updating a shared database of reported CSEC cases, with a focus on victim data protection and privacy.
- Develop sets of indicators that allow systematic monitoring and analysis, including identifying vulnerability indicators and CSEC risks.
- Prepare local action plans and allocate resources to work with beneficiary categories.
- Involve legal representatives to provide legal assistance regulating the legal status of migrant children.
- Improve the cooperation of all relevant bodies and institutions, international and domestic organizations, CSOs by clearly defining responsibilities and signing memorandums on cooperation
- Conduct research to examine and monitor public awareness and opinion on CSEC, including tech-facilitated CSEC and children's online activities and vulnerabilities.
- Design research/evidence-informed preventive measures, including against social discrimination and stigmatization of CSEC survivors.
- Support educational programs in school and community (formal and non-formal) focusing on the development of preventive programs in recognizing causes and risk factors.
- Make prevention consistent and expand beyond project-based programmes led only by NGOs.
- Equip CSOs with specialized services and support.

Law enforcement and criminal justice

- Continuous monitoring of legislative framework enforcement and defining gaps which need to be addressed by amendments.
- Enhance implementation of relevant policies and legislation.
- Continue working to identify CSEC cases and create local level teams.
- Prosecute reported cases in adherence to the relevant articles in the criminal code.
- Develop standards on conduct within and between competent authorities in CSEC cases, which would make the responsible authorities and services more responsible for taking the necessary measures within their competencies to assist the child.

- Establish and improve international and regional cooperation with other police agencies and prosecutors, to effectively monitor and combat CSEC.
- Train police officers and relevant personnel in identifying perpetrators and potential victims.
- Involve all stakeholders in efforts to foster identification and reporting of cases.
- Develop and provide training programmes on working with vulnerable groups of children.
- Conduct joint training of all relevant actors at the municipal level to familiarize them with each other's responsibilities.
- Raise awareness within relevant state institutions and departments responsible for the provision of support and access to rights at national and local levels.
- Conduct regular joint training of police officers in charge, in particular border police officers, airport officials and representatives of misdemeanour bodies, to enhance knowledge of international humanitarian law standards and the recognition of the need for protection of vulnerable groups.
- Organize special teams involving Roma-led CSOs in the detection and prevention of forced begging and early or forced marriages.
- Prioritize the identification of and support to unaccompanied and migrant children.

Civil society, NGOs and international organizations

- Strengthen CSO capacities to licence their services.
- Analyze the rulebook on licencing services in regard to licensing specialized services for children.
- Use a participatory approach to creating services designed to support children with approved protection.
- Allocate financial resources for the provision of services by CSOs to all beneficiaries in the child support system.
- Promote services provided by CSOs.
- Ensure timely access of vulnerable groups to CSO services.
- Enhance collaboration with other CSOs, NGOs and international organizations in the country and region.

Private sector

- Develop adequate, mandatory operational protocols to identify and report CSEC in the travel and tourism industry (hotels, private accommodation, private companies, agencies, etc.)
- Train travel and tourism employees on the protocols and preventive measures.
- Organize awareness-raising media campaigns, produce videos, leaflets, billboards, etc., and make them visible in the tourist facilities.
- Strengthen the collaboration with police and labour inspectors.

NORTH MACEDONIA

Child protection systems

- Strengthen the assistance for reintegration and protection of child victims.
- Improve training, cooperation and awareness of the role of each of the competent institutions and ensure appropriate monitoring of the institutional response in CSEC cases.
- Prioritize implementation of the adopted legislation, policies and strategies on children's rights.
- Develop a national strategy for promoting and protecting children's rights.
- Establish a strategic approach and plan for professional development of staff from various institutions which are part of the child protection system.
- Conduct a training needs assessment and establish special annual plans for professional development of all relevant stakeholders included in the prevention and protection system.
- Revise the statutory body charged with oversight of the implementation of the UN Convention on the Rights of the Child.
- Implement GRETA recommendations, including the provision of adequate assistance measures, such as accommodation, and adequate identification of male victims of human trafficking.
- Prioritize identification and prosecution of human trafficking and CSEC cases, rather than increased attention to the issue of migrant smuggling.
- Intensify efforts to confiscate assets and criminal proceeds acquired through criminal acts related to CSEC.
- Establish a strong monitoring framework, including public access to independent complaint mechanisms.
- Improve support and services targeted at migrant children and those who have been returned as failed asylum seekers, as well as LGBT youth, as they are in the high-risk groups.
- Amend the current statistical base to enable proper and adequate service planning and monitoring for all the high-risk groups.
- Introduce special assistance programmes and measures targeted at Roma children, developed in cooperation with Roma families and communities.
- Provide shelter access to all human trafficking and CSEC victims, regardless of their legal or residential status. In case this is not possible and foreign national victims who are staying in the country illegally are placed by the Ministry of Interior– Unit for combatting trafficking in human beings and migrant smuggling (UCTHBMS) at the reception centre for foreign nationals, then the employees at the reception centre should be adequately trained to provide help and support to the victims.
- Introduce and/or strengthen reintegration programmes in shelters and the reception centre for foreign nationals, so that survivors can be better equipped to successfully reintegrate into society.
- Increase funding for civil society organizations conducting prevention activities and providing services to the victims of human trafficking and sexual violence.
- Include children and young people in public debate about online risks, digital safety and opportunities.

- Ensure adequate support services are available for those who experience harm online and that children are aware of how to access those services.

Law enforcement and criminal justice

- Increase efforts to detect and solve CSEC cases and adopt suitable measures for prosecution of perpetrators.
- Allocate sufficient funds for the implementation of the national strategies and action plans for curbing CSEC.
- The national committee should revise and improve the current approach and system for data collection and make information publicly-available which can be used to track the progress the country has made in addressing CSEC. Also, consider increasing its level of transparency and accountability.
- Increase capacity building for the cybercrime sector within the Ministry of Interior and create a learning environment conducive to furthering the understanding and knowledge of tech-facilitated CSEC.
- Continue monitoring online content, digital literacy training and social media preferences and policies, in order to increase the capacity for early detection and prevention of tech-facilitated CSEC and distribution of illicit content online.
- Increase capacity for early prevention actions, adopt the good practices from the mobile teams' activities and ensure institutional financial support for their continuous work.
- Strengthen support of the commission, social workers, police and health personnel.
- Prioritize the training of personnel who work on the child prevention system.
- Implement guidelines for policymakers on child online protection by the ITU.¹⁹⁶

Civil society, NGOs and international organizations

- Mobilize resources to continue the successful work of the mobile teams, which provide effective mechanisms for identification of potential CSEC victims.
- Raise CSEC awareness among young people.
- Promote reporting mechanisms among the general public: suspected CSEC cases should be reported to the Ministry of Interior on the police emergency number (192), the THB hotline (0800 111 11) or on the online application redbutton.mvr.gov.mk.
- Promote and prioritize preventive mechanisms, such as the use of #block cyber trafficking hashtag and establishing an active hotline to increase the level of awareness and reporting capacity.
- Develop educational materials for parents, teachers and social workers.
- Update the mapping of the existing infrastructure (institutions and organizations) that are working with child rights' protection and child victims.
- Collaborate with the private sector, especially hospitality companies, travel agencies, local hotels and ICT companies.

Private sector

- Design coordinated training programmes for employees in the public sector.
- Establish a regional cyber culture and awareness hub across different sectors of society to facilitate awareness raising and faster responses to the ever-changing cybersecurity landscape.
- Assist other stakeholders in identifying vulnerable groups and high-risk behaviour across the public, in particular children and women, to inform targeted, coordinated awareness campaigns.
- Collaborate with NGOs in developing preventive programmes and supporting existing efforts to counter CSEC.
- Promote measures available to protect privacy and enable users to make informed decisions as to when and how they share their personal information online.
- Develop a cooperation mechanism with MASIT, the chamber of commerce for information and communication technologies, which may add value and impact toward developing support for awareness-raising, detection and reporting of potential CSEC victims.¹⁹⁷
- Prioritize training on early detection and recognition of potential CSEC victims.
- Strengthen cooperation between telecommunication units and law enforcement.

SERBIA

Child protection systems

- Include the mandatory topics of CSEC and its manifestations, such as tech-facilitated CSEC and CSEC in the hospitality industry in school curriculums.

Law enforcement and criminal justice

- Allocate a budget for combating CSEC and its manifestations, especially tech-facilitated CSEC.
- Continue trainings for representatives of law enforcement and the judiciary.
- Initiate signature of memorandums of cooperation among countries in the region on CSEC.
- Overcome legal and administrative obstacles to use available platforms addressing CSEC and supporting investigations (e.g. Better Internet for Kids).
- Strengthen human resources of the law enforcement, judiciary and service providers to prevent burnout of staff working on CSEC cases.
- Encourage exchange of information and experience among professionals in different countries in the region and beyond.
- Organize regular meetings and trainings for law enforcement and prosecution representatives at the national and regional levels.

Civil society, NGOs and international organizations

- Raise capacities of Serbian CSOs on CSEC.
- Develop and support services and reintegration programmes for CSEC victims.
- Make services available to all children, particularly those in rural and economically and socially disadvantaged environments.
- Include children in the development of services and preventive measures.
- Develop preventive programmes for parents on CSEC, especially tech-facilitated CSEC and children's digital risks.

- Adjust preventive activities to target the language and IT tools children use most frequently.
- Enhance the capacities of and encourage the media to report on CSEC cases, in line with the code of conduct.

Private sector

- Promote the Code against CSEC within the hospitality and ICT sectors.
- Implement capacity-building and preventive activities on combating CSEC in the travel and tourism and ICT sectors.
- Make identification and reporting procedures transparent.
- Involve private sector representatives in national referral mechanisms and implementation of existing standard operating procedures.

▼ **Places of exploitation
in Albania.** © Besart Cani



RECOMMENDATION MATRIX

	General	Tech-facilitated CSEC	SECTT	Roma
Legal framework	<div><div>1.</div><div>Ratify or accede to relevant conventions, protocols, and regional instruments and implement the obligations arising from international documents and conventions.</div><div>2.</div><div>Clearly recognize CSEC, including tech-facilitated CSEC, in strategic documents.</div><div>3.</div><div>Harmonization of national legislation with international and regional legislation, signed conventions and protocols and of definitions across laws and strategic documents.</div><div>4.</div><div>Adopt national legislation that prohibits, prevents and responds to tech-facilitated CSEC and CSEC in all their manifestations, and develop by-laws, regulations and procedures.</div><div>5.</div><div>Harmonize legislation related to CSEC and tech-facilitated CSEC criminal offences and intentional conduct: producing, offering or making available; distributing or transmitting; procuring CSAM for oneself or for another person; possession of CSAM; conscious access to CSAM through ICT.</div><div>6.</div><div>Terminology guidelines for the protection of children from sexual exploitation and sexual abuse should be used as guiding principles.</div><div>7.</div><div>Include and define CSEC, including tech-facilitated CSEC, as separate crimes within the criminal code.</div><div>8.</div><div>Review the definition of the child within the criminal code and harmonize it with the constitution, law on social and child protection and family law, as well as with the UNCRC.</div><div>9.</div><div>Raise the age of consent for legal sexual intercourse.</div><div>10.</div><div>Reconsideration of the exceptions that refer to possible marriage before the age of majority, from the age of 16.</div><div>11.</div><div>Promotion of a child-friendly approach within the legislative framework and practice.</div><div>12.</div><div>Adopt a law on monetary compensation for victims of criminal acts within the legislation and find sources for its implementation.</div><div>13.</div><div>Include the conscious attendance of sexual abuse with participation of children as an offence in the criminal code.</div><div>14.</div><div>The criminal code should prescribe as aggravating circumstances the fact that the perpetrator, either intentionally or negligently, endangered the life of the child or that the crime involved severe violence or caused serious harm to the child.</div></div>	<div><div>1.</div><div>Adopt a formal definition of child sexual abuse material and criminalize other forms of online child sexual exploitation such as online grooming and sexual extortion.</div><div>2.</div><div>The term 'child pornography' should be replaced by the term 'child sexual abuse material'.</div><div>3.</div><div>The term 'child pornography' in the criminal code should be defined, to ensure decriminalization of the self-generated sexual images of children possessed by the latter with their consent and solely for their own private use.</div><div>4.</div><div>A periodic review of legislation is necessary due to the evolving and high-tech nature of tech-facilitated CSEC.</div></div>		<div><div>1.</div><div>Define special measures for the protection of vulnerable groups, including Roma and migrant children.</div></div>

	General	Tech-facilitated CSEC	SECTT	Roma
Child protection system	<ol style="list-style-type: none"> 1. Enhance a multi-agency coordinating mechanism to include all relevant entities, emphasizing the role of different agencies for more information about, funding for and intervention on child sexual exploitation and abuse. 2. Ensure civil society and NGO participation in the policy-drafting and decision-making process. 3. Develop mechanisms to link the respective national strategies on child protection, human trafficking, education, social inclusion, etc. 4. Develop a national strategy for promoting and protecting children's rights and the statutory body charged with oversight of the realization of the UNCRC, coordinated between local and central level and by providing social care services adequately in local level. 5. Cooperation between governments and NGOs/organizations (domestic, regional and international) must be improved in the area of prevention, by clearly defining responsibilities and signing memorandums on cooperation. 6. Initiate signing of memorandums of cooperation among countries in the region on CSEC and particularly tech-facilitated CSEC. 7. Launch and fund research centres and institutes that gather data and support improved data collection methods, allowing for more targeted prevention and protection approaches. 8. All stakeholders to be involved in updating data in a unified database with a developed set of indicators that allow monitoring and analysis, and share important information, including providing publicly available data. 9. Identify one entity as the 'guardian/owner' of the unified database and first point of contact to access data (metadata); for international enquiry, INTERPOL should be the first point of contact. 10. Develop a system of unique case numbers for all involved entities to avoid double entries. 11. Conduct further research to provide national statistical reports on the phenomena. 12. Develop National Action Plans (NAPs) and strategies on tech-facilitated CSEC and CSEC, which should be dedicated actions that aim to prevent and protect children in the short- and long-term. 13. Establish formal protection and monitoring mechanisms, including registration schemes for aid and identification and monitoring systems to detect possible child victims of tech-facilitated CSEC and CSEC, especially those who are unaccompanied, to reduce the risk of exploitation. 14. Develop mechanisms to identify victims and recognize and treat CSEC victims as such. 15. Helpline and hotline mechanisms for the reporting of inappropriate content and support to victims should be strengthened and financially supported by the government, ensuring anonymity and the protection of personal data of victims. 16. Ensure victim assistance, such as accommodation, psycho-social and legal help, forensics and any further assistance is tailored for children's needs to enable them to fully recover and reintegrate into their communities. 17. Conduct analysis of the rulebook on licencing services in regard to licencing specialized services for children. 18. Allocate financial resources for the provision of services by CSOs to all beneficiaries in the child support system. 19. Establish a fund to provide compensation to child victims of human trafficking and sexual exploitation, in cases when said compensation cannot be collected from the perpetrator. 20. Intensify efforts to confiscate assets that were acquired through acts related to trafficking in human beings. 21. Establish access to independent grievance mechanisms, e.g. Ombudsman. 22. Use research results to define and create measures to prevent social intolerance to reported cases or stigmatization of victims. 23. Support formal and informal educational programmes in schools and communities focusing on the development of preventive programmes to recognize causes and risk factors. 	<ol style="list-style-type: none"> 1. NAPs should take dedicated tech-facilitated CSEC actions. 2. Enhanced collaboration with ISPs to monitor and regulate involuntary exposure to CSAM and provide needed data for investigation and assessment. 3. Develop information campaigns to inform parents about online safety for children on certain channels of communication. 4. The ministry of interior, through the police academy, should establish and provide pertinent and specialized training to build the capability of all relevant officers. 5. Establishment of a specialized body for high-tech crimes, with a special focus on tech-facilitated CSEC. 6. Develop mechanisms to monitor the activities of internet cafes and the content that is watched in these internet cafes in Kosovo. 7. Guidelines for policymakers on Child Online Protection 2020 by the ITU should be considered for implementation.¹⁹⁸ 8. Develop objective due diligence standards, agreed upon through multi-stakeholder consultation. 9. Work with partners to engage with the financial sector. 	<ol style="list-style-type: none"> 1. Develop, especially at local level, action plans and take measures to protect children from entering 2. into CSEC. 3. Tourism ministries, in cooperation with the other ministries responsible for child wellbeing, like that of health and social protection and interior, should work to implement a joint, multi-stakeholder strategy (raising awareness for travel and tourism operators, policies for information campaigns, etc.) to protect children from sexual exploitation in travel and tourism. 4. Involve representatives of travel and tourism in National Referral Mechanisms (NRM) and implementation of existing standard operating procedures. 	<ol style="list-style-type: none"> 1. Define special measures for the protection of Roma and migrant children. 2. Organize special teams involving Roma-led CSOs in detection and prevention of forced begging and early or forced marriages. 3. Foster identification and prevention activities to provide support to migrant children and unaccompanied minors on CSEC. 4. Establish reintegration programmes for national and foreign trafficking victims after the stay in the reception centre to enable the victims a successful integration into the society. 5. Involve Roma representatives in existing framework bodies.
Law enforcement and criminal justice	<ol style="list-style-type: none"> 1. Increased number of capacity-building trainings for police officers, prosecutors, judges and all relevant actors having regular contact with children about the phenomenon on how to adequately implement criminal justice for children and on technical terms (e.g. for tech-facilitated CSEC). 2. Development of specialized training curriculums at police academies and centres for education of judges and prosecutors. 3. Perform Training Needs Assessments and establish special annual plans for professional development of all relevant stakeholders, including in the prevention and protection system. 4. Regularly update equipment and software. 5. Close collaboration between judicial sector entities and child protection systems in investigating cases, including direct communication lines between police officers, prosecutors and cybercrime unit laboratories. 6. Organize regular joint meetings for law enforcement and prosecution representatives on the national and regional levels. 7. Monitor the number of human trafficking charges, including child trafficking for sexual and labour exploitation and share data with relevant actors from the child protection system and anti-human trafficking entities. 	<ol style="list-style-type: none"> 1. Reinvestment in the structure of the national computer laboratory for better technological tools and means to investigate cases. 2. Develop protocols on how to extract abusive material – most of the regional intelligence comes from external sources and expertise (EUROPOL, etc.). 	<ol style="list-style-type: none"> 1. Law enforcement agencies and tourism operators should be informed about CSEC and how to protect children from being exploited. 2. Strengthen cooperation with the labour inspection. 	

	General	Tech-facilitated CSEC	SECTT	Roma
CSOs and international organizations	<ol style="list-style-type: none"> 1. Facilitate child and youth participation, in awareness-raising campaigns and information sharing about the phenomenon, as this will increase the effectiveness of targeted prevention efforts and protection responses to tech-facilitated CSEC and CSEC. 2. Strengthen communities' knowledge about digital safety and the potential threats to children in the virtual space. 3. Develop the capacities and resilience of children through peer support systems and educational programmes. 4. Advocate for improving and expanding school curriculums to include education on digital and internet safety, risk identification and safeguards behaviours among children and youth. 5. Engage children, including child survivors, in the drafting and implementation process of various national action plans. 6. Raise awareness among relevant stakeholders and facilitate or implement mandatory training on sexual exploitation and abuse in the virtual space for all personnel, police officers, teachers, parents, civilians and volunteers. 7. Support states contributing personnel to peacekeeping operations in establishing anti-CSEC safeguards and reporting protocols, as well as in meticulously and promptly investigating CSEC allegations. 8. Ensure that national investigators are properly equipped to handle cases involving CSEC, such as prior experience with children, adequate training, experience with crimes involving children or crimes of a sexual nature, etc. 9. Mobilize financial and human resources to continue the successful example and mechanism of mobile teams in the identification of potential victims. 10. Make services available and accessible to all children, particularly those in rural and economically- and socially challenging environments. 11. Advocate for the regulation of digital safeguards and responsibilities among stakeholders in their respective sectors, including ISPs, parents, educational institutions (such as schools) and law enforcement agencies. 12. Collaborate with other civil society actors, NGOs and ICT companies (specifically ISPs), especially regarding knowledge, information and sharing of good practices. 13. Focus on and develop a long-term, strategic approach to addressing the issue, including conducting follow-up and evaluation of completed projects and programmes. 			
Private sector	<ol style="list-style-type: none"> 1. Media and journalists, especially online media, and professionals should be educated and trained to provide appropriate information relating to all forms of sexual exploitation and abuse of children, with due respect for the protection of personal data and the privacy of victims. 2. The private sector should not be complicit in and should proactively prohibit the use of sexualized images and messages involving children in their products and services. This includes the availability and promotion of products intended to sexualize girls at a young age in magazines, movies, computer games, clothing, toys, makeup and other products marketed to both adults and children. 	<ol style="list-style-type: none"> 1. ICT internet industry and companies should improve the limited liability regime of intermediary service providers, along with the unregulated area of notices and take-down procedures. ICT companies should establish protocols and clear procedures and policies regarding removing illegal or inappropriate materials from the platforms and services which they provide. 2. ICT companies should establish a mandate to monitor and report illicit contents transmitted through their networks, platforms and/or electronic communication devices and services. 3. ICT companies should collaborate more proactively with local NGOs, especially regarding sharing of knowledge, experience and information, raising awareness among ICT employees and putting safeguards and victim protection mechanisms in place. 4. The information and technology industry should ensure that online platforms have enhanced safety and safeguard measures, as well as promote and facilitate child safety referral services and helplines. 5. Technology companies should invest resources in ensuring an adequate number of human moderators to monitor some of the most sensitive categories of content, including child sexual abuse material and exploitation. 	<ol style="list-style-type: none"> 1. Increase capacity building and training on SECTT and CSEC for tour operators. 2. Increase engagement of tour operators with The Code. 3. Develop operational protocols in safeguarding and identifying victims and reporting cases in the travel and tourism industry and make them mandatory. 4. Organize media campaigns, produce videos, TV spots, leaflets, billboards, etc. and make them visible in the tourist facilities. 5. Improve cooperation with law enforcement and local NGOs, for example by establishing a reporting protocol to inform the police when the employees encounter misconduct or suspicious cases and have local anti-trafficking NGOs conduct employee training. 6. International, regional and larger companies are encouraged to provide support and share their safeguards, reporting experiences and protocols with smaller, local companies in the industry. 	

NOTES

- 1 Although 'child pornography' is still widely used as a legal definition in many countries, including in the US and in the Western Balkans, the use of this term is largely misleading and inaccurate. The term 'pornography' is used to refer to materials such as images, videos, books and other media that are intended to cause sexual excitement. Given that children are not yet mentally or physically mature, they cannot be fully aware of the activities that they might have been coerced into. The involvement of children in such materials should therefore not be defined as 'pornography' but 'child sexual abuse or exploitation'. Inaccurate use of terminology can downplay the exploitative nature of the phenomenon, as well as imply some degree of legitimacy from the perpetrator's side and compliance from the child victim's side.
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