# Policy action to address technology-facilitated trafficking in human beings

Report of the regional consultations led in 2023 by the OSCE's Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings

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# Contents

# Preface

In our rapidly evolving digital era, technology and innovation have become both a tool for empowerment and one that can be misused for criminal purposes. This dichotomy is especially evident in the field of trafficking in human beings where technology can be misused by traffickers but could also be leveraged by law enforcement and civil society to protect victims and fight the crime. Societies in general and policymakers in particular can leverage technology to prevent harm and keep children and adults safe. As we navigate the complexities of modern society, it becomes increasingly imperative to confront the intersection of technology and human trafficking head-on.



This report summarizes a set of policy recommendations discussed and made by anti-trafficking stakeholders from OSCE participating States during a series of sub-regional workshops[1] organized in 2023 by the Office of the OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings within the extra-budgetary project "Responding to Technology-Facilitated Trafficking in Human Beings."

The report highlights the general consensus existing among the anti-trafficking stakeholders participating in the OSCE sub-region workshops regarding the multifaceted relationship between technology and trafficking in human beings, stressing the centrality of technology in facilitating the crime of human trafficking. From online recruitment and control of victims to moving criminal proceeds through electronic payment systems, technology can be misused at every stage of the trafficking crime, presenting both challenges and opportunities for protecting victims and combating this global crime.

With reference to the current policy approaches towards online safety, this report highlights the view of the majority of practitioners attending the OSCE workshops regarding the limits of self-regulation in addressing the human trafficking risks that technology and online platforms are exposed to. While self-regulatory mechanisms have been touted as solutions, their limitations in effectively combating trafficking in human beings are evident. Many participants remarked that a more robust and comprehensive approach is necessary to tackle this pervasive issue.

We welcome the remarks from many OSCE experts emphasizing that an effective response, including at the policy level, requires a victim-centred approach that prioritizes the protection, empowerment, and support of survivors. Too often, victims of trafficking are overlooked or re-victimized, including due to gaps in the policies and legislation of OSCE participating States. Criminal justice processes often re-traumatize victims, even as they seek criminal accountability for traffickers, through harmful practices such as multiple interviews or testimony in processes that are not trauma-informed. By centring policies around the needs and experiences of survivors, we not only put the victims' interest first but

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1 The sub-regional workshops took place in The Hague, the Netherlands - 16 May 2023; Tallinn, Estonia - 19 June 2023; Bucharest, Romania - 21 November 2023; and Almaty, Kazakhstan - 12 December 2023.

we also strengthen our abiltiy to prosecute perpetrators, including in technology-facilitated human trafficking cases, in a way that reduces harm and prevents more exploitation.

Drawing from the resourceful and comprehensive discussions held during the four sub-regional workshops, this report offers a series of key policy recommendations aimed at addressing technology-facilitated trafficking in human beings. These recommendations are grounded in the principles of evidence-based policy development, accountability for harm caused, pro-active enforcement of regulations, and multi-agency approach. The recommendations in this report are not an exhaustive list of policy measures but a summary of recommendations discussed and made by anti-trafficking policymakers and practitioners from OSCE participating States during the above-mentioned sub-regional workshops. There are other perspectives and approaches that were not reflected in these discussions, such as those centering around harm reduction or exit strategies. Furthermore, this report builds on the previous work of the OSCE in this field and in particular the OSCE report - Policy responses to technology-facilitated trafficking in human beings: Analysis of current approaches and considerations for moving forward.[2]

As we confront the challenges in countering the misuse of technology by traffickers, let us acknowledge that our response should consist of comprehensive policies and legislation, which must be evidence-based and designed in close consultation with practitioners on the ground and survivors. It is my hope that this report will serve as an additional resource, contributing to meaningful policy changes that efficiently address the misuse of technology by traffickers, and ultimately, bring an end to the crime of trafficking in human beings.

This report was prepared under the lead of Radu Cucos, Associate Officer and the Technology and Trafficking in Human Beings Programme Lead in the Office of the OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings, to whom I am very grateful for his leadership and expertise. I would also like to thank Assistant Project Officer Altyngul Turaliyeva, Assistant Officer on CTHB Catherine Barnshaw in my Office and Director of the Sexual Exploitation Research and Policy Institute at the University College Dublin Ruth Breslin for their important contributions in the development of this report. I would also like to thank the donors of the extra-budgetary project "Responding to Technology-Facilitated Trafficking in Human Beings" whose financial support allowed the conducting of the regional workshops and development of this report, in particular the governments of Austria, Cyprus, France, Malta, Norway, the United Kingdom, and the United States of America.

**Kari Johnstone, Ph.D.**

**OSCE Special Representative and Co-ordinator for Combating Trafficking in Human Beings**

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# Background context

Technology-facilitated trafficking in human beings refers to the use of modern communication and information technologies, such as the internet, social media platforms, mobile phones, and other digital tools, to engage in various aspects of human trafficking. It involves the misuse of technology to recruit, transport, advertise, exploit or control victims. Technology itself is not the cause of human trafficking, but rather a tool that perpetrators misuse to carry out their criminal activities.

Tackling technology-facilitated trafficking has been a key priority for the OSCE's Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings for several years. Having undertaken a range of research and published policy analyses on this issue,[3] the Special Representative's Office coordinated a series of regional workshops focused on technology-facilitated trafficking across the OSCE region in 2023. Workshops held in the Netherlands (The Hague, May 2023), Estonia (Tallinn, June 2023), Romania (Bucharest, November 2023), and Kazakhstan (Almaty, December 2023) brought together professionals from a broad range of disciplines who hold responsibility for addressing trafficking in human beings (THB) in their own jurisdictions. The regional workshops were organized within the framework of the OSCE extra-budgetary project nr. 1102260 "Responding to technology-facilitated trafficking in human beings."

Participants from Government ministries, law enforcement, prosecutors, and the judiciary in each region were joined by a series of experts from similar backgrounds with experience in addressing technology-facilitated trafficking (TfT) in their own countries. Experts showcased their work in this area. The aim of these workshops was to enhance participants' knowledge of the nature and extent of TfT and explore ways to tackle this phenomenon, building on the experience and insights shared by experts. Participants from many OSCE participating States in each region worked together collaboratively to make recommendations to monitor and more effectively combat TfT in their own jurisdictions.

Experts and participants acknowledged that technology plays a central role in trafficking for the purpose of both sexual exploitation and labour exploitation. Experts highlighted that technology is actively misused in the targeting and recruitment of victims of different forms of trafficking. However, it was also acknowledged that technology plays a deeper role in the ongoing sexual exploitation of victims of trafficking for this purpose, who are primarily vulnerable women and children. For this reason, THB for the purpose of sexual exploitation was the main focus of workshops' content and discussions.

The following report of the regional workshops outlines some of the key areas of consensus established amongst experts and participants in their understanding of TfT. It then sets out a series of policy recommendations for tackling this phenomenon and strengthening OSCE participating States' responses to it, based on the insights shared by experts and participants across the four workshops.



3 See: OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, 2023. Mapping the Online Landscape of Risks of Trafficking in Human Beings on Sexual Services Websites across the OSCE Region: https://www.osce.org/files/f/documents/b/4/555441.pdf;
OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, 2022. Policy Responses to Technology-Facilitated Trafficking in Human Beings: Analysis of Current Approaches and Considerations for Moving Forward: https://www.osce.org/files/f/documents/0/d/514141.pdf.

# Key areas of consensus

## The centrality of technology to trafficking in human beings

Experts agreed that the misuse and exploitation of technology now plays a central role in both facilitating and expanding the crime of trafficking in human beings (THB) across the globe. Technology is at the heart of the business model of human trafficking – evidence was presented from OSCE participating States illustrating the widespread misuse of technology at every stage of the trafficking crime, from grooming and recruitment, to movement, coercion, control, and advertisement of victims and ultimately to the exploitation of those victims for profit. Experts and participants noted that cases of trafficking that have not been facilitated by technology during at least one stage of the process are becoming increasingly rare to find. The phenomenon of technology-facilitated trafficking (TfT) is occurring throughout the OSCE region, regardless of any differences between States in terms of geographical location, socio-economic context or legislative regimes.

Experts and participants provided countless examples of the tools and platforms currently exploited by traffickers in perpetrating their crimes, including:

- Mainstream social media in all its forms, which traffickers use most proactively to identify, target, groom, and recruit victims;

- Instant messaging services where the grooming, deception, and control of victims is amplified and often difficult to detect as traffickers benefit from end-to-end encryption;

- Platforms that host sexually explicit content (text, imagery, and videos) to advertise victims of trafficking to potential buyers;

- Platforms that host pornography featuring victims of trafficking and facilitate the livestreaming of adults and children being sexually abused and exploited;

- Online banking, electronic payment services, and cryptocurrency, which facilitate the seamless movement and often laundering of traffickers' profits.

Experts described how social media is now one of the most used methods for the recruitment of trafficking victims. Traffickers are proactive in exploiting the personal details that their potential victims share about themselves on social media, from their hobbies and interests to any hardships they may be experiencing in their lives. Traffickers use this information to their advantage to identify and target vulnerability, build trust, develop false intimacy, and ultimately groom and deceive their victims for the purpose of exploitation.

Experts and participants noted that proving grooming, control, and exploitation that takes place online can be very challenging. This is due to the complex dynamics of these behaviours and the fact that the communications that facilitate victim control often move from public social media to private messaging apps with end-to-end encryption, and may even take place without any in-person contact between the trafficker and their victim. One expert explained that the only tools some traffickers need to be successful in profiting from their victims is internet access, a microphone, headphones, and access to online banking.

A number of experts further highlighted the central role that websites facilitating the sale and purchase of sexual services[4] play in facilitating and amplifying trafficking for the purpose of sexual exploitation, by seamlessly connecting victims to a very broad 'customer base' of sex buyers. In addition to advertising and directly facilitating buyers' sexual access to the bodies of trafficking victims, traffickers widely exploit such sites to store, distribute, and sell exploitative content (including pictures, videos, and via livestreaming). Some contributors highlighted the fact that prostitution[5] advertisers are not merely 'neutral players' that post content – it is clear that in some cases such platforms, knowingly or with gross negligence, facilitate sexual exploitation.

Technology is further implicated in the facilitation of trafficking through the processing of financial transactions associated with online commercial sex. The move from sex buyers paying with cash to using online peer-to-peer money transfer services, and traffickers' use of cryptocurrencies to move money and launder their profits, were cited by experts as factors that make trafficking and the profits that ensue more difficult than ever to track.

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4 Also called prostitution websites, adult services websites or sexual services websites.

5 The term "prostitution" is formally used by the official OSCE documents related to anti-trafficking commitments. Nevertheless, it is acknowledged that some in the anti-trafficking community, including some survivors, prefer the term "commercial sex."

A number of experts also raised concerns about the use of new and emerging technologies in the facilitation of human trafficking, and sexual exploitation in particular. The misuse of artificial intelligence, including deepfake technology, was highlighted as an emerging risk that must be closely monitored in this context.

# The limits of self-regulation

Experts and participants were united in the view that, in the case of combating TfT, allowing online platforms to self-regulate did not stop traffickers from misusing technology and innovation at a great scale. Some technology companies whose tools and products have been misused to facilitate trafficking have prioritized increasing the user base for the purpose of gaining larger profits rather than safety of the most vulnerable. Participants provided many examples of technology companies' failures to proactively identify and report obvious cases of exploitation occurring on their platforms, to remove harmful content, to retrofit safeguards to protect victims and prevent further abuse, and, in some cases, to cooperate in trafficking investigations.

In this vein, there was a broad consensus that technology companies invest more efforts in providing a frictionless service for their users, alongside protecting user privacy, than in the rights and protections of users who are exploited by traffickers misusing platforms' services and resources. For many such companies, their business model is premised on regular users accessing and revisiting their platform, staying on the platform for as long as possible, and trusting that their data and platform activities are kept secure. As a result, many companies appear loath to introduce measures that

might impinge on the user experience, even when this means facilitating the activities and protecting the privacy of perpetrators seeking to gain access to sexually exploited adults and children.

Experts provided examples of the failure of self-regulation from the United States of America and the Netherlands. Before it was shut down by federal authorities in 2018, Backpage, at the time the largest prostitution advertising website in the US, knowingly allowed the advertisement of children and facilitated the editing of flagged ads to remove reference to the child's age so that revised versions of the same ad could be published. Backpage also artificially supressed the reporting of missing children who were advertised on its site by only referring reports to the relevant authorities when the report was made by the child's parents; in doing so, they failed to act on all reports made by other family members or concerned parties.[6]

In the Netherlands, recent hackathons or 'checkathons' led by a multidisciplinary teams of experts involved the posting of fake ads featuring children on multiple prostitution advertising websites. Moderation proved to be poor, and the ads were rarely blocked or removed, receiving a lot of attention from sex buyers. It became clear that there were very few reports of child sexual exploitation made to the authorities by these sites, and virtually no consequences for non-compliance with basic safeguarding measures. The team leading the checkathons attempted to work with the site owners to develop a new code of conduct, but this approach achieved little success and led the team to preparing a detailed report for the Dutch parliament highlighting the failure of self-regulation and the need for much stronger legislation in this context.[7]

6 See Press Release, U.S. Dep't of Justice, Backpage's Co-founder and CEO, As Well As Several Backpage-Related Corporate Entities, Enter Guilty Pleas (Apr. 12, 2018), https://www.justice.gov/opa/pr/backpage-s-co-founder-and-ceowell-several-backpage-related-corporate-entities-enter-guilty.

7 OSCE, "Presentation on Multidisciplinary cooperation by Maarten Noordzij, the Netherlands Public Prosecution Service", OSCE Regional Workshop to Address Technology-Facilitated Trafficking in Human Beings 16-18 May 2023, The Hague, the Netherlands.

## The importance of the victim-centred approach

Experts and participants alike acknowledged the hugely significant economic, social and human costs of technology-facilitated trafficking and highlighted the need to place the victims and their needs at the heart of any protective and preventive measures.

Experts outlined the profitability of THB based on the fact that, unlike a single-use substance such as narcotics, persons, specifically women and children exploited in prostitution, can be sold for use over and over again, multiplying traffickers' profits. The ease with which such 'sales' can be made in the online environment is a further profit multiplier, particularly when the exploitation of the same victim can be sold simultaneously in multiple places around the world such as in webcamming.

Experts also highlighted victim commonalities – with the most typical one being situational or intrinsic vulnerabilities – the vast majority of victims of trafficking have some kind of vulnerability, such as poverty, physical and cognitive disabilities or experiences of childhood abuse, which traffickers are highly adept at identifying and preying upon. Tech-nology has readily facilitated traffickers' targeting and deception of vulnerable persons who go online for different purposes. It was noted that increased time spent online by so many during the global Covid-19 pandemic saw traffickers' recruitment methods becoming more sophisticated and innovative – allowing recruiters to build up trusting relationships online with victims over time, ultimately resulting in false promises leading to exploitation.

Experts from the USA, Canada, and Ireland highlighted the importance of adopting a victim-centred approach to tackling trafficking in all its guises, including TfT. Opportunities for victims to experience safety, stability, and recovery were deemed essential for all victims, including those who may provide evidence against their traffickers or help law enforcement investigate them. In this regard the essential nature of specialist support services for victims' recovery from exploitation was highlighted. Experts also urged adherence to the non-punishment principle provided for in various anti-trafficking instruments, designed to ensure that no trafficking victims are penalized for crimes they may have committed in the course of being trafficked. In securing justice for victims, seizing traffickers' earnings and channelling them into victim restitution is a relatively common practice in the US, the Netherlands, and Norway.

# Key policy recommendations

## Identify and understand the problem

Experts highlighted the importance of each State developing a clear understanding of the nature and reach of technology-facilitated trafficking in their own jurisdictions. This understanding is essential before the problem can be effectively addressed, including at the policy level. Insights into the role that technology is playing in THB can be gleaned from a variety of sources including victim testimony, law enforcement intelligence and investigative evidence, and direct analysis of the online platforms implicated in TfT in each jurisdiction.

In this regard, experts recommended a specific focus on platforms that facilitate the sale and purchase of sexual services. Unlike the vastness of mainstream social media or the impenetrability of closed messaging apps, these advertising sites provide targeted, and largely accessible, locations where both intelligence and evidence of TfT can be found. These sites can take many forms, including sites advertising escort services, massage services, brothels, broader 'classified' advertising platforms, advertising aggregators, 'hobby' boards for sex buyers, sugar daddy sites, dating sites/apps, and marriage arrangement sites. However, the majority are freely accessible in order to attract as many buyers as possible, and therefore provide an excellent location for open-source intelligence (OSINT) and evidence gathering.

Experts urged participants to be proactive in monitoring such sites to enhance the fight against TfT in their own jurisdictions. As a first step, it was strongly recommended that States undertake identification and mapping of all the advertising sites, both domestic and international, that are operational in their jurisdiction. The OSCE has previously documented this process,[8] which leads to an enhanced understanding of how the commercial sex industry operates in each jurisdiction and the extent and nature of trafficking and exploitation that occurs within it. Experts explained that once 'you know your own market,' being equipped with such knowledge can greatly enhance States' efforts in the detection and criminal accountability of THB, protection of victims, and ultimately prevention.

Experts and participants shared their own experiences of mapping advertising websites and identifying key indicators or 'red flags' for THB in the online space. The analysis of data and content on mapped websites is typically supported by tailored technology tools and/or the existing technology tools designed for this purpose.[9] Some described mapping exercises led by law enforcement, while others recommended multidisciplinary 'mapping partnerships' involving law enforcement, civil society, and private companies with technology expertise. Mapping supports law enforcement in particular to identify the sites/platforms that present the highest risk of TfT to prioritize these for investigation and enforcement in the first instance.

Experts and participants also highlighted the importance of identifying and understanding the indicators of TfT in the local context. Using indicators such as those outlined by the OSCE[10] to proactively detect potential victims of THB online yields results, but it is clear that these indicators can vary across jurisdictions and must be applied in a tailored way that reflects the domestic market. Participants from across the OSCE participating States described a wide variety of indicators that were particularly relevant in their own countries and geographical regions, such as the involvement of third parties, the particular features or quality of photos used in advertising profiles, grammar errors in profile text, very low prices, women advertised with unlimited availability, the use of emojis to indicate that the girl advertised is under 18 or that children are on offer, and the presence of tattoos indicating 'ownership' by a pimp or trafficker. However, not all such indicators were present or of relevance in all markets; hence the importance of incorporating local knowledge and context into all online mapping and victim identification exercises.

## Holding platforms accountable for technology-facilitated trafficking

Experts and participants agreed that platforms that facilitate THB must be held accountable for their actions or indeed inaction in tackling this phenomenon. A focus on these platforms is necessary because:

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8 OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, 2023, ibid.

9 OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, 2020. Leveraging Innovation to Fight Trafficking in Human Beings: A Comprehensive Analysis of Technology Tools: https://www.osce.org/files/f/documents/9/6/455206_1.pdf.

10 See: OSCE Office of the Special Representative and Co-ordinator for Combating Trafficking in Human Beings, 2023, ibid. 'Example list of red flags' p. 21: https://www.osce.org/files/f/documents/b/4/555441.pdf.

- Traffickers are misusing the platforms resources and infrastructure;

- They have intelligence, data, and information on trends and patterns in THB online that are valuable for law enforcement; and

- They possess the financial resources and technological expertise to help in combating instead of facilitating trafficking and exploitation.

However, given the consensus that self-regulation by platform owners alone has been ineffective in developing an efficient online safety environment and that 'naming and shaming' such platforms has had little impact to date, both experts and participants agreed with the need to formulate policy and legislative responses that oblige or incentivise platforms to act. Experts made a number of recommendations in this regard, which combine much more robust self-regulation measures with State-driven regulation, including compelling platform owners to:

- Introduce age and consent verification measures for all persons depicted on their platforms

- Conduct regular due diligence of activities on their platforms to prevent misuse, including for the purposes of grooming and recruitment of potential victims of THB

- Monitor, identify, and report all potential cases of THB on their platforms to law enforcement with due regard for the privacy and safety of victims or potential victims.

- Create or simplify content removal request mechanisms so that adult and child victims of trafficking and exploitation can have online evidence of their exploitation promptly and permanently removed

- Securely preserve data/records of potential TfT on their platforms for a specified period of time so that these can be used in investigation and prosecution proceedings.

While experts and participants acknowledged the importance of introducing or even retrofitting 'safety-by-design' measures such as age and consent verification, one expert argued that these remain far from reliable. There are many workarounds to these measures, and ultimately it is simply not possible for any consumer or even moderator to know for certain whether any individual featured on a given platform is under or over 18, or whether the person providing consent to be advertised has in fact freely and genuinely consented to selling sexual access to their body without deception or coercion of any kind.

At the same time, it was highlighted that online platforms are different in their business models and services they provide and that are differently exposed to human trafficking risks. For example, platforms facilitating the purchase and sale of sexual services have different human trafficking risks compared to dating or online gaming platforms. In this regard, policy interventions should take into account this important fact and be designed in a tailored manner to ensure that platforms are not affected disproportionally.

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11 Allow States and Victims to Fight Online Sex Trafficking (FOSTA), 2017-2018: https://www.congress.gov/bill/115th-congress/house-bill/1865/text and Stop Enabling Sex Traffickers Act (SESTA), 2017: https://www.congress.gov/bill/115th-congress/senate-bill/1693/text.

# Introduce/enforce punitive measures for non-compliance

For those companies who fail in the above measures and their platforms continue to disregard THB risks, experts showcased a range of punitive responses, including:

- Limiting access to, blocking or shutting down platforms that operate against the law and their illegal operations contribute to THB

- Investigating and prosecuting online platforms as legal entities, and in doing so holding platform owners financially and criminally liable for facilitating THB knowingly or with gross negligence.

Across the OSCE there are a number of successful examples of punitive measures of this nature, but it was noted that these cases tend to be 'outliers' rather than the norm.

In the USA, Backpage (discussed above) was shut down, its owners charged with trafficking-related crimes, and ultimately convicted of promoting prostitution and money laundering, amongst other offences. The introduction of the FOSTA/SESTA legislation followed shortly thereafter.[11] This legislation is designed to make websites liable for knowingly facilitating sex trafficking or intentionally promoting the prostitution of others, although participants noted that it has rarely been applied in prosecutions. Others have noted the closure of Backpage and other sites has eliminated some ways that people selling sex—whether as consenting adults or trafficking victims—shared information on how to stay safe, thus increasing risk of violence and trafficking.

Experts shared the case prepared by the US Department of Homeland Security against CityXGuide, as a further example of successful enforcement action against a platform facilitating trafficking. In 2021 CityXGuide's owner pleaded guilty to promoting prostitution and reckless disregard of sex trafficking, was sentenced to more than eight years in prison, and ordered to forfeit more than $15 million in assets.[12]

In 2017, Israel passed the Online Crimes Preventive Powers Act,[13] which gave powers to designated prosecutors to apply to the district courts to prohibit access to or to shut down websites implicated in human trafficking, prostitution, pornography, on-line gambling, drug trafficking, and terrorism. One expert outlined the measures taken as an enforcement approach, designed to disrupt and ultimately dismantle the business model of these websites, while also tackling demand that fuels THB for sexual exploitation by deterring consumers. Thousands of illegal websites have been shut down or blocked from the jurisdiction as a result of this legislation.

Ease of enforceability is key to the Act's success; once a warrant has been issued against a particular provider the warrant can be relatively easily amended and reapplied if the site appears online again in the same or a similar form. The expert cited very positive results from enforcement but acknowledged that persistence is required – sites may reappear on six or seven occasions before the above enforcement action is permanently successful and the business can no longer operate. Participants noted that in the case of prostitution, sex buyers can use a VPN (virtual private network) or access the dark web as workarounds. However, others pointed out that only a minority of buyers will pursue these routes, so blocking or take down actions automatically shrink the sites' customer base significantly.



Experts recommended that consideration should also be given to the harms and potential crimes perpetrated against victims when sexually explicit and exploitative imagery and videos of them are generated and widely shared online via livestreaming and advertising sites. Adopting a victim-centred approach, as discussed above, means that victims' right to privacy and protection should

12 For further details see: https://www.justice.gov/usao-ndtx/pr/cityxguide-owner-sentenced-8-years-prison-reckless-disregard-sex-trafficking.

13 Knesset of Israel, 'Law on Authorities for the Prevention of Committing Crimes through Use of an Internet Site, 5777-2017' (Law on Authorities). See: https://www.loc.gov/item/global-legal-monitor/2017-10-10/israel-law-authorizes-court-to-restrict-access-to-internet-sites-in-order-to-prevent-criminal-activity/#:~:text=(Oct.,gazette%2C%20SH%5D%205777%20No.

be the priority over and above the privacy of perpetrators seeking to gain access to sexually exploited adults and children or profit motives of sites. Domestic legislation on the sharing of child sexual abuse material (CSAM) and non-consensual sharing of explicit materials featuring adults (also known as 'image-based sexual abuse') is likely to be applicable in this regard. Therefore, when prosecuting such cases, prosecutors should charge perpetrators cumulatively for the crime of human trafficking and production and distribution of CSAM or non-consensual sharing of explicit materials featuring adults. Experts noted that there is a need to reassess the balance in the online space between preserving privacy and the protection of human rights and preventing harm – ensuring online security should not prevent abusers and exploiters from being held accountable for their actions.

A number of experts highlighted new and emerging legislation in various participating States and at the European Union level that show potential promise in the fight against TfT in the future. These include:

• The EARN IT Act (Eliminating Abusive and Rampant Neglect of Interactive Technologies Act) in the USA, which clarifies that there is no immunity for online platforms that knowingly facilitate the distribution of any kind of materials featuring child sexual abuse/exploitation. The Act was reported to the US Senate on 15 May 2023.

• The Online Safety Act in Australia, which requires online platforms to remove harmful content at the behest of a designated online safety commissioner. The Act came into force on 23 January 2022.

• The EU Digital Services Act, which places obligations on very large online platforms and search engines to address and prevent illegal and harmful content and activities occurring on the services they provide. The Act entered into force on 16 November 2022.

• The UK Online Safety Act 2023, which provides for a new regulatory framework that has the general purpose of making the use of internet services regulated by the Act safer for individuals in the United Kingdom. The Act received Royal Assent on 26 October 2023.

Also of note is the new EU Directive on Combating violence against women and domestic violence, which includes measures to combat gender-based 'cyber violence' and shows potential for applicability to trafficking for the purpose of sexual exploitation.

## Develop policy guidance and harmonize approaches

Participants raised the point that not all national legislation makes explicit reference to the commission of THB crimes that misuse technology. Many participating States where this is a gap have nevertheless applied the working principle that 'what is illegal offline is also illegal online' and successfully applied their existing anti-trafficking legislation crafted originally for the offline context to combat trafficking that is facilitated online.

Experts noted that while it is certainly helpful to formulate or update domestic anti-trafficking legislation to include specific reference to TfT, where this is not currently possible States should provide law enforcement and other stakeholders with clear guidance as to the interpretation and application of existing legislation to the online space. Guidance of this nature is important to ensure a more uniform strategic approach is adopted by law enforcement and other stakeholders to tackling TfT within each participating State.



A number of experts and participants recommended the formulation of dedicated multi-stakeholder taskforces or working groups to bring together insights and expertise on TfT and develop a holistic, coordinated strategy to combat the phenomenon. Ideally this would be State-led, involving leaders from across the relevant Government ministries/departments, but should also include the expertise of victims/survivors of TBH, law enforcement, civil society and academic experts in the field, as well as representatives from the commercial sector with technological expertise.

As the online platforms currently being misused to facilitate THB are the focus of policy development in this area, it was recommended that they should also be represented. However, a note of caution was sounded here. Given the great limitations of self-regulation (as described above), and the understanding that these platforms are primarily driven by profit, providing them with 'a seat at the table' represents a potential conflict of interests, particularly if they use this opportunity mainly for the preservation of their business model and to create obstacles to greater accountability. Only those companies that can demonstrate that they are acting in good faith, have victims' interests at the heart of their approach, and genuinely want to transform their platforms into a safer place for all users should be included in such forums.

Given the global nature of the online world and the transnational nature of THB, experts and participants recommended greater harmonization of responses to TfT, within States, across regions, and even more widely. They noted the challenges of trying to work in collaboration with other participating States to address TfT, when laws differ from country to country, citing differences in legal definitions, standards, and obligations as particularly problematic. It was noted that double criminality is impossible to establish in cases of transnational TfT where the purchase of sexual access is legal in one State but illegal in the other and that a more harmonised approach that tackles demand would be particularly useful in this regard.[14] The potential for State's individual taskforces addressing TfT to work together to achieve greater collaboration and ultimately harmonization was highlighted. A more unified approach and collaboration across States would also reduce traffickers' and platforms' ability to exploit differences in laws and approaches or change venues to avoid accountability.

Casting the net further, a number of experts recommended combating TfT through enhanced awareness-raising and educational initiatives for the public at large. This would include education on the potential risks that platforms pose in facilitating trafficking, and the grooming and recruitment of vulnerable adults and children in particular. Initiatives in this vein should also provide accessible information on how to identify the signs of THB and report them accordingly, as well as public education to tackle demand by deterring the purchase of sexual access to the bodies of trafficked and exploited persons.

## Strengthen the criminal justice response

Experts and participants made a host of recommendations to strengthen the criminal justice response to TfT, in terms of investigation, evidence-gathering, and the building and prosecution of cases in court. Key recommendations include:

- 'Following the money' – building cases against traffickers misusing technology and online platforms by gathering intelligence and investigating their financial transactions (FININT) to establish how they are profiting, where their profits lead, and whether and how these have been laundered, which can also reduce the burden on victim testimony and survivor re-traumatization



14 The OSCE itself recommends tackling demand as a key strategy in the prevention of THB, see for example: OSCE Office of the Special Representative and Coordinator for Combating Trafficking in Human Beings, 2021. Discouraging the Demand that Fosters Trafficking for the Purpose of Sexual Exploitation: https://www.osce.org/files/f/documents/7/f/489388_2.pdf.

- Making greater use of MLATs (Mutual Legal Assistance Treaty Requests) in investigations – although these can be time-consuming it was argued that inter-country cooperation on TfT is essential, particularly given the transnational nature of the platforms concerned

- Taking a strategic but pragmatic approach to investigations – in mapping the multiple websites implicated in TfT in each jurisdiction it is often wise to target investigative resources at the largest and most high-risk platforms, particularly given that many of the smaller sites are often owned by the larger platforms

- Educating prosecutors and the judiciary on the complexities of TfT and a victim-centred approach – this was recommended as important to ensure that these professionals have sufficient understanding of the nature and severity of the crimes involved so that justice for victims can be secured.

In terms of policing specifically, experts from the USA and Canada recommended their approach of regular platform monitoring, identification of indicators, and arranging contact with potential victims to assess their welfare and provide assistance or protection, measures which are carried out in collaboration with anti-trafficking NGOs specialized in victims' protection and support. This is coupled with operations to identify and apprehend sex buyers, sometimes through the use of decoys or fake adverts posted online, particularly targeting those seeking to purchase sexual access to children or vulnerable young women. Police also target operations to tackle consumer demand at large events such as mega sporting events.



Law enforcement experts also highlighted the need to improve the collection and storage of electronic data gathered during TfT investigations, so that these can be appropriately preserved as high-quality evidence for use in court. Data-sharing between jurisdictions should also be enhanced and streamlined in this regard. The acceptance in court of digital evidence gathered during TfT investigations, including evidence gleaned via technology tools, was noted as an ongoing challenge that could benefit from clearer policy and legislative guidance. Such efforts could reduce the reliance on victim testimony and reduce re-traumatization of multiple law enforcement interviews or testimony.

A number of experts cited the advantages of working with, or at least seeking cooperation from, platforms whose services are being misused by criminals to facilitate trafficking in order to identify and protect victims. Some platforms are willing to provide data/evidence on individual cases upon the request of police, or will respond effectively to a request from law enforcement to remove content. Police also use such platforms as important intelligence-gathering and investigative tools in their wider anti-trafficking operations, particularly victim identification. The same experts also noted that they place equal value on rescuing a victim as they do on apprehending a trafficker. Experts also highlighted that applying trauma-informed and victim-centered approaches is crucial in combating technology-facilitated human trafficking, as it ensures survivors receive compassionate care and support throughout the recovery process and reduces re-traumatization. By prioritizing the needs and experiences of victims, they can create more effective and humane strategies to disrupt and prevent trafficking networks.

A divergence in views was noted among experts in this regard. Others argued that the above case-by-case approach is too narrow, and that a more pro-active 'whole market' approach to tackling TfT produces much more significant results. It was noted that it is in the platforms' best interests to drip-feed intelligence and evidence to law enforcement on a case-by-case basis – they hope that this 'cooperation' on the detail of individual cases will shield them from more robust enforcement action that will disrupt or dismantle their business model, which in the meantime continues to benefit from facilitating THB. One expert asked what success looks like in this context – a reduction in victims of trafficking, or an end to trafficking through the broader dismantling of the infrastructures that facilitate it? Others maintained that traffickers typically exploit multiple victims, and therefore holding them accountable as perpetrators should be the ultimate priority for law enforcement.

15 See OSCE and Tech Against Trafficking, Leveraging innovation to fight trafficking in human beings: A comprehensive analysis of technology tools (Vienna: OSCE and TAT, 22 June 2020)

Some participants also queried the approach of targeting all prostitution advertising platforms, suggesting it is best to only focus on the 'most harmful' ones, while others noted that those who willingly engage in prostitution require these platforms to operate. A number of experts countered these assertions by highlighting that TfT is found on all such platforms and that a completely 'safe' prostitution advertising platform is yet to be found.

Taking a macro or 'whole market' approach typically involves disrupting or dismantling the business model of these platforms and can go as far as blocking or shutting them down entirely to prevent further THB. As discussed above, persistence is required in this regard as multiple enforcement actions may be required before the "bad-faith" platform accepts defeat, and experts noted that strong political will is needed to support such actions.

Some experts further cited the importance of maintaining a victim-centred approach, even when 'whole market' disruption/enforcement actions are being undertaken. There are clearly ethical implications to removing vulnerable persons' only source of income in one fell swoop. Victims will require immediate follow-up support that ensures their safety, as well as medium-longer term support to assist them to recover from their experiences in commercial sex and rebuild new lives and ways of sustainably supporting themselves.

In this regard it was recommended that a more long-term and phased legal and enforcement strategy against the platforms should be considered, supported by policy and legislative guidance, with prosecution of the platforms for their crimes a key component of this strategy.

## Enhance resourcing, including technical expertise

Experts and participants agreed that technology is a 'double-edged sword' – while it is clearly being misused to facilitate THB, it can also be used very effectively as a force for good in combating THB. Traffickers are using and misusing technology to their benefit in the perpetration of their crimes, so it is imperative that those combating THB use technology just as successfully to reach their goals.

Experts noted that success in tackling TfT requires interdisciplinary cooperation, including with persons and companies with the right technological expertise, and that this approach needs to be sufficiently resourced if it is to have a real and positive impact.

In addition to 'people power' and technological know-how, OSCE participating States must invest in technology tools. It was noted that a wide range of technology tools are already available to anti-trafficking stakeholders[15] and therefore the main priority should be investing in the implementation and evaluation of existing tools rather than development of new ones. Participants recommended that States should provide dedicated and ring-fenced budgets for the identification, mapping, and investigation of TfT.

Finally, participants highlighted the need for continuing leadership and guidance from the OSCE in tackling TfT, and requested a range of resources that would support participating States' own efforts in this regard, including a set of knowledge tools and practical exercises to support investigation and prevention measures such as hackathons and/or simulation training, as well as further capacity-building facilitated by the OSCE and its experts.

# Annex 1 - List of anti-trafficking stakeholders who participated in the OSCE regional policy consultations on addressing technology-facilitated trafficking in human beings

**16 May 2023, The Hague, the Netherlands**

| 1 | BELGIUM | DJSOC/Centrex |
|---|---|---|
| 2 | BULGARIA | Prosecutor in the "Economic" Department of the Sofia District Prosecutor's Office |
| 3 | CANADA | Counsel Criminal Law Policy Section Department of Justice Canada |
| 4 | FRANCE | Head of the international unit - French Central Law Enforcement Agency against THB (OCRTEH) |
| 5 | HUNGARY | Legal Officer, Ministry of Justice of Hungary |
| 6 | ICELAND | Legal Advisor, the Ministry of Justice |
| 7 | MALTA | Senior Manager, Human Rights Initiatives Unit |
| 8 | MALTA | Lawyer, Office of the Attorney General |
| 9 | MALTA | Inspector, Vice Squad, Malta Police Force |
| 10 | NETHERLANDS | Dutch National Rapporteur on Human Trafficking and Sexual Violence against Children |
| 11 | NETHERLANDS | Ministry of Justice and Security |
| 12 | NETHERLANDS | Ministry of Foreign Affairs |
| 13 | NETHERLANDS | Police |
| 14 | NETHERLANDS | Ministry of Justice and Security |
| 15 | PORTUGAL | Office of the National Rapporteur on Trafficking in Human Beings |
| 16 | PORTUGAL | Cabinet of the Minister of Justice |
| 17 | ROMANIA | Police Commissioner, National Agency Against Trafficking in Persons |
| 18 | ROMANIA | Deputy Chief Police Commissioner, Romanian Police |
| 19 | SPAIN | Deputy Inspector, Spanish National Police |
| 20 | SWITZERLAND | National Coordinator against Trafficking in Human Beings, Federal Office of Police |
| 21 | UNITED KINGDOM | HO Online Safety Policy Lead |
| 22 | UNITED KINGDOM | MSOIU Policy and Development |
| 23 | USA | Human Trafficking Prosecution Unit, Department of Justice |

| 1 | CANADA | General Counsel, Quebec Regional Office, Public Prosecution Services Canada |
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| 2 | CANADA | Detective, Ottawa Police Services |
| 3 | ESTONIA | Police and Border Guard Board |
| 4 | ESTONIA | Internal Defense Academy EMN Estonia |
| 5 | ESTONIA | Police and Border Guard Board |
| 6 | ESTONIA | Police and Border Guard Board |
| 7 | ESTONIA | Labor inspection |
| 8 | ESTONIA | Police and Border Guard Board |
| 9 | ESTONIA | Social Insurance Agency |
| 10 | ESTONIA | Police and Border Guard Board |
| 11 | ESTONIA | Northern Prefecture, Police and Border Guard Board |
| 12 | ESTONIA | Social Insurance Board |
| 13 | ESTONIA | Social Insurance Board |
| 14 | ESTONIA | Labor inspection |
| 15 | GEORGIA | International Relations and Legal Cooperation Department, Legal Cooperation Unit, Ministry of Justice of Georgia |
| 16 | GEORGIA | Investigator at Main Investigative Unit (III) of Tbilisi Police Department of Ministry of Internal Affairs of Georgia |
| 17 | LATVIA | Ministry of Interior |
| 18 | LITHUANIA | Ministry of Internal Affairs |
| 19 | LITHUANIA | Lithuanian Criminal Police Bureau, Activity Coordination and Control Board, Pre-trial Investigation Coordination and Control Unit, Chief Investigator |
| 20 | MOLDOVA | Senior inspector, Main officer of the Political Directorate in the field of public order and security and combating crime, Ministry of Internal Affairs |
| 21 | MOLDOVA | Head of the Legal Division of the Ministry of Internal Affairs |
| 22 | POLAND | Chief Specialist-Judge, Ministry of Justice |
| 23 | POLAND | Expert, Ministry of Justice |
| 24 | POLAND | Department for Combating Trafficking in Human Beings, Criminal Bureau, National Police Headquarters |
| 25 | SLOVAKIA | Prosecutor, General prosecutor's office |
| 26 | SLOVAKIA | Prosecutor of the District prosecutor's office Bratislava III |
| 27 | SLOVAKIA | Operative officer of the National Unit Combating Illegal Migration of the Bureau of Border and Foreign Police |
| 28 | SLOVAKIA | Senior police officer for Cybercrime unit of the National Centre for Specific Crimes of the Presidium of the Police Force |
| 29 | SLOVENIA | Criminal Inspector Specialist, Ministry of Interior - Police, Criminal Police |
| 30 | SLOVENIA | Criminal Inspector Specialist, Ministry of Interior - Police, Criminal Police |
| 31 | UKRAINE | Senior operative officer in the special cases of the Migration Police Department of the National Police of Ukraine |
| 32 | UKRAINE | Senior investigator in the special cases of the Main Investigative Department of the National police of Ukraine |

| 1 | ALBANIA | Albanian National Authority for Electronic Certification and Cyber Security (AKCESK) |
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| 2 | ALBANIA | Albanian National Authority for Electronic Certification and Cyber Security (AKCESK) |
| 3 | BOSNIA AND HERZEGOVINA | Senior expert advisor for Trafficking in Human Beings, Section for fighting against Trafficking in Human Beings, Ministry of Security of Bosnia and Herzegovina, |
| 4 | BOSNIA AND HERZEGOVINA | Expert accociate for Trafficking in Human Beings. Section for fighting against Trafficking in Human Beings, Ministry of Security of Bosnia and Herzegovina, |
| 5 | CROATIA | The Office for Human Rights and the Rights of National Minorities |
| 6 | CROATIA | The Office for Human Rights and the Rights of National Minorities |
| 7 | CYPRUS | Member of the Parliament of Cyprus |
| 8 | GREECE | Vice Public Prosecutor at the First Instance Court of Piraeus |
| 9 | MONTENEGRO | Adviser of Supreme Court of Montenegro |
| 10 | MONTENEGRO | Judge of Supreme Court of Montenegro |
| 11 | NORTH MACEDONIA | Inspector in the National Unit for countering migrant and human trafficking, Ministry of Interior of North Macedonia |
| 12 | ROMANIA | Chancellery of the Prime Minister State Counsellor President of the Inter-ministerial and Inter-sectoral Strategic Coordination Committee for Combating Trafficking in Human Beings |
| 13 | ROMANIA | National Authority for Administration and Regulations in Communications President |
| 14 | ROMANIA | National Authority for Administration and Regulations in Communications Directorate for Public Relations Director |
| 15 | ROMANIA | National Authority for Administration and Regulations in Communications Head of the Control Coordination Unit |
| 16 | ROMANIA | Superior Counsellor, Ministry of Justice |
| 17 | ROMANIA | General Inspectorate of Romanian Police Directorate for Combating Organized Crime Unit for Combating Trafficking in Persons |
| 18 | ROMANIA | General Inspectorate of Romanian Police Directorate for Combating Organized Crime Unit for Combating Cyber-crime |
| 19 | ROMANIA | General Inspectorate of Romanian Police Directorate for Criminal Investigations |
| 20 | ROMANIA | General Inspectorate of Romanian Police Liaison Officer to SELEC |
| 21 | ROMANIA | Directorate for Investigating Organized Crime and Terrorism Unit for Combating Trafficking in Persons Prosecutor |
| 22 | ROMANIA | General Inspectorate for Immigration Directorate for Migration |
| 23 | ROMANIA | General Inspectorate for Immigration Directorate for Asylum and Integration |
| 24 | ROMANIA | Ministry of Internal Affairs National Agency against Trafficking in Persons Director |
| 25 | ROMANIA | Ministry of Internal Affairs National Agency against Trafficking in Persons Head of the Project Management and International Relations Unit |
| 26 | ROMANIA | Ministry of Internal Affairs National Agency against Trafficking in Persons the Project Management and International Relations Unit International Relations Specialist |

| 27 | ROMANIA | Ministry of Internal Affairs National Agency against Trafficking in Persons Project Management and International Relations Unit Project Implementation Officer |
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| 28 | ROMANIA | Ministry of Internal Affairs National Agency against Trafficking in Persons Project Management and International Relations Unit Project Implementation Officer |
| 29 | ROMANIA | Ministry of Internal Affairs National Agency against Trafficking in Persons the Project Management and International Relations Unit International Relations Specialist |
| 30 | SERBIA | Police lieutenant, Office for Coordination of Activities in Combating Trafficking in Human Beings, Cabinet of Police Director, General Police Directorate, Ministry of Interior of Republic of Serbia, |
| 31 | TURKIYE | Gendarmerie Major, Acting Head of Section of Combating Cyber Crime, General Command of Gendarmerie |
| 32 | TURKIYE | Data Scientist, Presidency of Migration Management |
| 33 | TURKIYE | 3rd Grade / 3rd Degree Chief Superintendent, Directorate General of Security |
| 34 | ELIBERARE | General Director |
| 35 | ELIBERARE | Lean on Advocacy |
| 36 | SOUTHEAST EUROPEAN LAW ENFORCEMENT CENTER | Director General |
| 37 | INTERNATIONAL JUSTICE MISSION, EUROPEAN ANTI-TRAFFICKING PROGRAM | Criminal Intelligence Analyst |
| 38 | INTERNATIONAL JUSTICE MISSION, EUROPEAN ANTI-TRAFFICKING PROGRAM | Partnerships & Advocacy Lead |
| 39 | INTERNATIONAL JUSTICE MISSION, EUROPEAN ANTI-TRAFFICKING PROGRAM | Program Manager |
| 40 | INTERNATIONAL ORGANIZATION FOR MIGRATION | Consultant - Counter-Human Trafficking |
| 41 | INTERNATIONAL ORGANIZATION FOR MIGRATION | Operations Assistant - Counter-Human Trafficking |

**12 December 2023, Almaty, Kazakhstan**

| 1 | ARMENIA | Head of Human Trafficking and Women Issues Division, Equal Opportunities Provision Department, Ministry of Labor and Social Affairs of the Republic of Armenia |
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| 2 | ARMENIA | Chief specialist of the legislation division of the legal Department, Ministry of High-Tech Industry of the Republic of Armenia |
| 3 | AZERBAIJAN | Head of the Cyber Security Service under the Ministry of Digital Development and Transport of Azerbaijan |
| 4 | GEORGIA | Prosecutor of the Human Rights Protection Department PSG |
| 5 | KAZAKHSTAN | Head (Rektor) of Law Enforcement Academy under the Prosecutor General's Office |
| 6 | KAZAKHSTAN | Head of Faculty, Law Enforcement Academy under the Prosecutor General's Office |
| 7 | KAZAKHSTAN | Member of Parliament (Mazhilis) |
| 8 | KAZAKHSTAN | Assistant of Member of Parliament (Mazhilis) |
| 9 | KYRGYZSTAN | Representative of the Main Directorate of Criminal Investigation of the Ministry of Interiors of the Kyrgyz Republic, police lieutenant colonel |
| 10 | KYRGYZSTAN | Chief Specialist of the Migration Department of the Ministry of Labour, Social Security and Migration of the Kyrgyz Republic |
| 11 | TURKMENISTAN | Employee of 6th Unit of Ashgabat City Police Department |
| 12 | TURKMENISTAN | Chief pf Unit, Main Investigation Department, Prosecutor General's Office |
| 13 | TURKMENISTAN | Chief specialist, Unit of Technical Projecting and Law under Agency for Communication |
| 14 | UZBEKISTAN | Head of Department, Senate of Oliy Majlis |
| 15 | UZBEKISTAN | Chief specialist, Ministry of Digital Technology |

**OSCE** Organization for Security and
Co-operation in Europe