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Child-Centered Anti-Trafficking Approaches in Mediterranean Migration Routes: Italy and Turkey

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Abstract: Introduction: Child trafficking is a clear violation of human rights, robbing minors of their fundamental entitlements. These encompass the right to personal identity, familial bonds, cultural heritage, access to healthcare and proper nourishment, education, freedom of speech, and the assurance of safety and security. Children and young people, given their inherent vulnerability and limited access to support networks, frequently struggle to safeguard themselves effectively. This predicament presents traffickers with opportunities to exploit and manipulate them. Therefore, it is essential for professionals across various sectors—including education, healthcare, protective and social services, as well as the justice system—to undergo comprehensive training and be integrated into a robust social protection system. This preparation should equip them to conduct screenings, accurately assess needs, and adhere to international guidelines when addressing cases of child trafficking. Aim: The aim of this study is to explore the child-centered anti-trafficking approaches employed by Italy and Turkey, situated along migration pathways in the Mediterranean region and experiencing significant regular and irregular migration flows in recent years. Both nations fall within the classification of southern European welfare regimes. Methodology: This research specifically delves into the social protection policies aimed at children and young victims established by these two countries. Carried out between 1 February 2020 and 20 May 2021, this study employed a semi-structured interview approach, conducting qualitative in-depth interviews in both Italy and Turkey. This research targeted experts from various disciplines engaged in combating human trafficking in both countries, with a total sample size of 46 participants, comprising 15 experts from Italy and 31 from Turkey. Grounded theory formed the basis of the study, with data analyzed using the MAXQDA 2020 Pro Analytics program, employing a multidisciplinary and empowerment approach. Results: The analysis yielded 2942 codes, 17 sub-themes, and four main themes. The study identified four main themes: (i) characteristics of child victims and vulnerable child groups, (ii) services provided to at-risk groups and child trafficking victims within the current national countertrafficking framework, (iii) challenges encountered in delivering services to children and young individuals, and (iv) recommendations for establishing an effective and child-centered protection system. Discussion and Conclusion: It is imperative to ensure that victims of child trafficking have access to comprehensive social protection measures. It has been noted that both Italy and Turkey offer various services to victims of child trafficking, including in-kind and -cash social assistance, free legal aid, shelter services, access to education and healthcare, as well as prevention, awareness, and advocacy programs. However, there are also differences between the two countries in certain aspects. Recommendations aimed at addressing these differences can be developed by adhering to the minimum standards outlined in the Council of Europe Convention on Action against Trafficking in Human Beings.

Keywords: child trafficking; vulnerable children; children on the move; Mediterranean migration route; social protection policies; Italy; Turkey

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1. Introduction

Child trafficking is a pervasive global issue, encompassing the exploitation and coerced movement of children for purposes such as labor, sexual exploitation, and domestic

servitude (UNODC 2022). Its impact is staggering, affecting millions worldwide, yet precise figures remain elusive due to the secretive nature of the crime and challenges in reporting. This exploitation involves various activities like recruitment, transportation, harboring, or receipt of children for purposes of labor, sexual abuse, involvement in conflicts, or organ removal (United States Department of State 2023). Children's vulnerability, stemming from their age and dependency, makes them easy targets for traffickers who exploit their innocence and lack of legal protections (European Union Agency for Law Enforcement Cooperation 2022).

Recent data underscore the persistence and extent of child trafficking:

- Globally, approximately 152 million children are engaged in child labor, a significant number of whom are trafficked (International Labour Organization 2021a, 2021b).
- Children trafficked for sexual exploitation, with girls disproportionately affected, constitute a notable proportion of trafficking victims (UNICEF 2020).
- Child trafficking rates vary regionally due to factors such as poverty, education gaps, and political instability, with southeast Asia and parts of Africa reporting particularly high incidences (UNODC 2021).

Efforts to combat child trafficking involve international legal frameworks such as the United Nations Convention on the Rights of the Child and national legislation criminalizing trafficking and protecting victims. Despite these efforts, challenges persist in enforcement, victim identification, and providing comprehensive support and rehabilitation.

Trafficking affects every nation, with children being particularly vulnerable. The 2022 UNODC report reveals that one in three identified trafficking victims globally is a child, with lower-income countries reporting higher incidences, often for sexual exploitation (UNODC 2022). In the EU, trafficking predominantly targets women and girls for sexual exploitation (European Parliament 2021). The United Nations Palermo Protocol defines child trafficking as involving the recruitment, transportation, transfer, harboring, or receipt of a child under 18 for exploitation, emphasizing their inability to consent (United Nations 2000). Unlike adult trafficking, coercion or deception is not necessary for defining child exploitation. Trafficking occurs domestically and internationally, exploiting victims through forced labor and sexual exploitation, especially prevalent in the EU (UNODC 2022). Ongoing conflicts, such as those in Syria, Ukraine, Gaza, and South Sudan contribute significantly to displacement and migration flows, increasing vulnerability to trafficking across regions (UNHCR 2019; FRONTEX 2019; European Union Agency for Asylum 2024).

Italy and Turkey are crucial in Mediterranean trafficking routes, categorized as Tier 2 countries in trafficking reports (United States Department of State 2024). Their differing social protection approaches highlight the need for comprehensive policy integration and comparative analysis (United States Department of State 2024). The Council of Europe Convention on Action against Trafficking in Human Beings, beyond the Palermo Protocol, prioritizes victim-centered protections and comprehensive prevention, protection, prosecution, and partnership strategies (Council of Europe 2005). This legal framework, adopted by Turkey and Italy, addresses various forms of exploitation, including forced labor and sexual exploitation (Directive 2011/36/EU).

Children and adolescents, due to their inherent vulnerability and limited protective networks, face heightened risks of exploitation and trafficking. Cross-sectoral training for professionals in education, healthcare, social services, and the justice system is crucial for effective screening, needs assessment, and adherence to international guidelines in child trafficking cases (European Parliament 2021). Child trafficking victims face a myriad of complex issues that significantly impact their physical, psychological, and social well-being. The main issues that child trafficking victims commonly face are as follows:

Physical and Sexual Abuse: Trafficked children often endure physical violence and sexual abuse at the hands of traffickers or those exploiting them. This abuse can lead to physical injuries, sexually transmitted infections, and long-term health consequences (APA 2014).

Psychological Trauma: Children subjected to trafficking experience severe psychological trauma, including anxiety, depression, post-traumatic stress disorder (PTSD), and emotional instability. The trauma may stem from the initial abduction or recruitment, living in captivity, witnessing violence, or being coerced into criminal activities (Zimmerman et al. 2006).

Isolation and Control: Traffickers often isolate victims from their families and communities, making it difficult for children to seek help or escape. They exert control through threats, intimidation, and psychological manipulation, creating a sense of dependency and fear among victims (Zimmerman et al. 2003).

Exploitative Labor and Services: Child trafficking victims are commonly forced into labor exploitation, including domestic work, agriculture, construction, and manufacturing industries. They may also be exploited in commercial sex trade or used for criminal activities such as begging and drug trafficking (International Labour Organization 2017).

Lack of Access to Education: Trafficked children often have limited or no access to education. They are frequently deprived of schooling due to their exploitative work conditions, which perpetuates their vulnerability and limits their future opportunities (UNODC 2008).

Health and Well-being: Trafficked children typically lack access to adequate healthcare services. They may suffer from malnutrition, untreated illnesses, physical injuries, and substance abuse issues resulting from their exploitation (Kiss et al. 2015).

Legal and Social Services: Many child trafficking victims face significant barriers in accessing legal and social services. Language barriers, lack of documentation, fear of authorities, and unfamiliarity with their rights hinder their ability to seek justice, protection, and support (Clawson et al. 2009).

Stigmatization and Reintegration Challenges: Trafficked children often face social stigma and discrimination upon their return to communities. Reintegrating into society is challenging due to trauma, lack of skills, education gaps, and the stigma associated with their exploitation experience (Oram et al. 2012).

Continued Vulnerability: Even after rescue or escape, trafficked children remain vulnerable to re-trafficking or exploitation due to economic instability, lack of social support networks, and ongoing psychological trauma (IOM 2019).

Addressing these issues requires comprehensive approaches that prioritize child protection, rehabilitation, and reintegration into supportive environments. It involves strengthening legal frameworks, enhancing law enforcement and judicial responses, providing trauma-informed care and support services, promoting education and skills training, and fostering community awareness and prevention efforts to safeguard children from trafficking.

This study examines the child-centered anti-trafficking strategies implemented by Italy and Turkey, both situated along migration routes in the Mediterranean region and experiencing significant flows of both regular and irregular migration in recent years. Both nations fall under the South Mediterranean welfare regime classification, highlighting their distinct socio-political contexts. Effective measures against child trafficking necessitate collaborative efforts across borders and sectors, emphasizing prevention, victim support, and the prosecution of traffickers. By comparing Italy and Turkey's implementation of these measures, this study aims to enhance global understanding and propose effective social protection frameworks for child trafficking victims.

2. Materials and Methods

This study investigated social protection policies for children and young trafficking victims in Italy and Turkey between 1 February 2020 and 20 May 2021. Semi-structured interviews were conducted with 46 experts: 15 from Italy and 31 from Turkey, employing grounded theory for data analysis using MAXQDA 2020 Pro Analytics. The research involved interviewing experts from institutions known for their work in the field, using a snowball sampling method to identify additional participants. While the process was consistent across both the Italian and Turkish contexts, the researcher faced more bureaucratic obstacles in Turkey, leading to delays in reaching saturation and necessitating a

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higher number of interviews. No expert refused the interview request. However, some experts noted that, due to bureaucratic constraints in Turkey, written permission from their institutions was necessary. Mentioning the ethics committee approval from Italy and the status as a guest researcher at the University of Milan generally sufficed. Permission was also sought from various institutions in Turkey, but due to factors such as workload and the COVID-19 pandemic, some institutions either did not grant approval or did not respond to the request.

Additionally, the scarcity of institutions directly addressing human trafficking in Turkey, along with lower levels of awareness, prompted the inclusion of experts from organizations working with potential risk groups. During the interviews, three languages were used: English as the primary language, with Turkish and Italian employed as needed. In total, 15 experts from Italy and 31 from Turkey participated, representing a diverse array of professional roles across governmental, non-governmental, and international organizations.

In collaboration with the advisor, the study was presented to the Kocaeli University (2020) Social and Human Sciences Ethics Commission. The commission reviewed the study and found it ethically appropriate, as indicated by decision number 8 made during the meeting on 07/02/2020 (reference number 2020/02).

Following these ethical guidelines, volunteer experts were interviewed after being informed about the study and agreeing to participate under the specified conditions. Prior to the interviews, participants were given the Informed Consent Form, and the form was explained to some participants before their verbal consent was obtained.

To ensure anonymity, codes (İ1, İ2, İ3, etc., for experts from Italy, and T1, T2, T3, etc., for experts from Turkey) were assigned to the experts instead of using their real names. Third-party names mentioned during the interviews were also anonymized. The recordings, as well as the written and electronic records of the interviews, were stored securely and confidentially. The experts were informed that they could pause or terminate the interview at any time without providing a reason; however, this situation did not occur during the process.

Qualitative methods included literature analysis and interviews with stakeholders such as NGOs, municipalities, government agencies, and law enforcement. The focus was on comparing protection policies for child trafficking victims along Mediterranean migration routes, aligned with sustainable development goals.

Key research questions explored trafficking routes, types of exploitation experienced by victims, influencing factors, and effective policies. Grounded theory facilitated an inductive approach to understanding anti-trafficking systems, policies, and practices in Italy and Turkey. Ethical approval was obtained from the (blinded for peer-review). The analysis process involved the systematic creation of meaningful codes (units) by meticulously reading the data, which had been transferred to the MAXQDA software, on a line-by-line basis. The coding was conducted using an inductive, theory-oriented approach, following the coding model developed by Olesen, as referenced by Urquhart in the context of the "Grounded Theory" coding process (Olesen 2006; Urquhart 2022). Olesen's model comprises five stages: (1) categorizing the data into groups, (2) conducting open coding of the documents utilizing grounded theory, (3) selectively coding the open codes, (4) identifying themes that emerge from the coding process, and (5) recoding and revisiting themes based on their alignment with different social groups.

Initially, the data were categorized into distinct social groups. Subsequently, open coding of the documents was conducted using grounded theory and inductive coding, resulting in the identification of 2942 codes. In the third stage, selective coding was applied to these open codes, wherein codes with similar meanings were consolidated. This process necessitated multiple revisions to the groupings and nomenclature of the codes. In the fourth stage, potential themes began to surface, which were then critically re-evaluated in the fifth stage to ensure theme—data alignment. During this stage, the data were re-examined to identify any overlooked information, and re-coding was performed where necessary. In the final stage, the relationships between themes and sub-themes

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were delineated, and the content within the codes was interpreted in accordance with the theoretical frameworks of the capability approach and the empowerment approach.

In-depth semi-structured interviews covered socio-demographics, services, collaboration efforts, ethical guidelines, financial aspects, and staffing conditions. The study considered dynamic humanitarian contexts and policy-making processes affecting trafficking victims in both countries.

Confidentiality protocols safeguarded participant identities, and analysis applied the "4P" approach—prevention, protection, prosecution, partnership—outlined by the Palermo Protocol and the Council of Europe Convention. Evaluation focused on how Italy and Turkey implemented measures to protect trafficking victims along Mediterranean routes. This study aimed to enhance understanding of protective mechanisms against human trafficking, contributing insights into policy implications for victim rights and social protection literature.

In the analyses, efforts were made to accurately reflect the experts' emotions and thoughts. However, it is acknowledged that, within the framework of scientific ethics, no research can be entirely free from the researcher's values. Therefore, in the interest of transparency and critical reflection, it is recognized that a certain degree of self-reflexivity was inevitably present in the analysis process.

3. Results

3.1. Socio-Demographic Profiles of Interview Participants in Italy and Turkey

The interviews encompassed key figures from governmental bodies, non-governmental organizations, and international entities specializing in human trafficking. In Italy, the sample consisted of 15 experts, including experts, assistant experts, immigration specialists, judges, prosecutors, lawyers, social workers, psychologists, child development specialists, and professionals from other social science disciplines. This group served in roles such as association managers, institution managers, program/project coordinators, or case workers.

Specifically, the Italian segment featured fifteen experts, comprising three males and twelve females. Six of these experts represented NGOs or social cooperatives with NGO status, while three were affiliated with the Municipality of Venice's national human trafficking project. Additionally, three experts held positions as Regional and National Chief Public Prosecutors, and another three specialized in international human rights law, preferring to maintain anonymity regarding their institutional affiliations.

The institutions represented within the Italian sample included the following:

- Brescia Region Chief Public Prosecutor's Office (Italian Procure della Repubblica di Brescia);
- Proxima Social Cooperative (Cooperativa Sociale Proxima);
- Anti-mafia Presidency (Direzioni Distrettuali Antimafia);
- Municipality of Venice (Veneto region)—National N.A.ve. Project;
- Penelope Association (Associazione Penelope Coordinamento Solidarietà Sociale Onlus);
- Dedalus Social Cooperative (Dedalus Cooperativa Sociale);
- District Anti-Mafia Directorate of the Catania Prosecutor's Office;
- National Human Trafficking Emergency Helpline "Numero Verde" and National Referral Project managed by the Municipality of Venice.

In terms of educational background, ten experts held postgraduate degrees, four were undergraduates, and one had specialized high school education, with extensive experience in human trafficking. Age-wise, four experts were aged 18–30, four were 31–45, and seven were over 45 years old. Geographically, five experts worked nationally, while ten operated regionally across Brescia, Ragusa, Veneto, Naples, Sicily (Messina and Catania), and Tuscany. Their fields of expertise spanned law, social work, psychology, public administration, economics, and cultural studies, focusing on humanitarian services, social protection, migration, and human trafficking.

In Turkey, the research included thirty-one experts, with five males and twentysix females. This group comprised individuals from non-governmental organizations, Soc. Sci. **2024**, 13, 700 6 of 21

municipalities, public institutions, and international organizations, including roles such as investigative judge, migration specialists, human rights advocates, equality experts, ombudsmen, social workers, and psychologists. Institutional details were disclosed for consenting participants, while identities were coded for confidentiality.

The institutions represented within the Turkish sample included the following:

- Ministry of Internal Affairs, General Directorate of Migration Management, Department of Protection of Victims of Human Trafficking;
- Ministry of Internal Affairs, General Directorate of Migration Management, Department of International Protection;
- Ministry of Justice Victims' Rights Department;
- Ombudsman Institution;
- Turkish Human Rights and Equality Institution;
- Turkish Red Crescent Association;
- Support to Life Association;
- Istanbul Metropolitan Municipality;
- Izmir Metropolitan Municipality;
- Çankaya Municipality;
- Association for Assistance, Solidarity and Support with Refugees and Asylum Seekers, MSYD-ASRA;
- Mardin Joint Women's Cooperation Association;
- Watan Foundation;
- United Nations Population Fund;
- Development Workshop Social Cooperative;
- Deep Poverty Network.

These profiles provide comprehensive insights into the diverse backgrounds and roles of participants involved in combating human trafficking across Italy and Turkey.

3.2. MAXQDA Analysis:

The research analysis involved importing data into the MAXQDA software and conducting detailed line-by-line readings to derive meaningful codes (units) from the content. Following an inductive and theory-oriented approach to coding, inspired by Olesen's methodology, as cited by Urquhart in the "Grounded Theory" framework (Olesen 2006; Urquhart 2022), the process identified a total of 2942 codes, organized into seventeen sub-themes and four main themes.

These main themes encompassed the following:

- (i) Characteristics of child victims and vulnerable child groups and patterns of trafficking exploitation: This theme details demographic profiles, victimization methods, types of exploitation encountered, dynamics of victim–trafficker relationships, and impacts of exploitation and re-victimization.
- (ii) Services provided to at-risk groups and child trafficking victims within the current national counter-trafficking frameworks: This theme covers the structure and operation of national anti-trafficking systems and associated services, including processes such as initial detection and identification of victims, operational frameworks of anti-trafficking mechanisms, provision of protection and support services, procedures for safe repatriation, legal frameworks, collaborative approaches, and challenges in service delivery.
- (iii) Challenges encountered in delivering services to children and young individuals: This theme outlines the various challenges in service delivery, highlighting bureaucratic hurdles, insufficient funding, lack of coordination among agencies, and specific difficulties faced in regions with high migration flows.
- (iv) Recommendations for establishing an effective and child-centered protection system: This theme provides recommendations aimed at enhancing the effectiveness of protection systems, focusing on strategies to address capacity and infrastructure limitations, promote interdisciplinary collaboration, overcome bureaucratic hurdles and funding constraints,

raise awareness and expertise among trafficking-related entities, ensure social inclusion of victims to prevent discrimination, alleviate poverty, and respect cultural sensitivities.

3.3. Country Frameworks for Safeguarding Chil Victims of Trafficking

This section examines Italy's and Turkey's frameworks for safeguarding and supporting child victims of trafficking, with a focus on legislative, preventive, protective, and prosecutive measures. Through a review of relevant literature, expert interviews, and observational data, this analysis evaluates the effectiveness and comprehensiveness of these frameworks. The objective is to provide a detailed, evidence-based assessment of how these measures address the needs of child trafficking victims, highlighting both strengths and areas for improvement in each country's safeguarding efforts.

3.3.1. Italy's Comprehensive Framework for Safeguarding Child Victims of Trafficking

Italy has developed a comprehensive and robust framework to combat human trafficking, focusing significantly on child victims. This framework includes a sophisticated legal structure, national mechanisms, specialized support programs, and proactive initiatives such as the ADITUS project.

Italy's legal framework for addressing human trafficking, evolving since 1998, is highly regarded by the European Union and international bodies. Italy ratified several key international conventions, including the UN Convention against Transnational Organized Crime and the Palermo Protocol in 2006 and the Council of Europe Convention on Action against Trafficking in Human Beings in 2010. Notable legal provisions include Article 18 of the National Immigration Law, which provides special residence permits and social protections for trafficking victims, and Article 13 of the National Anti-Trafficking Law, which offers temporary protection and support.

Victims can obtain residence permits through judicial channels, linked to criminal proceedings, or social pathways managed by NGOs and social services, which offer assistance without mandatory police reporting. These permits are initially granted for six months and can be extended for up to 18 months, with options to convert them into educational or work permits. Importantly, victims are not required to cooperate with authorities to access these protections, provided they declare their victimization.

The national anti-human-trafficking mechanism, led by the Prime Minister's Department of Equal Opportunities (DEO), plays a pivotal role in coordinating efforts to combat trafficking. Established in 2000 and reinforced by Decree Law No. 24 in 2014, the DEO oversees prevention, law enforcement, and social protection. The National Anti-Trafficking Plan (NAP/UEP), adopted in 2016, focuses on victim identification, prevention, prosecution, and enhancing response capabilities. The DEO funds emergency support and social protection programs, with accredited NGOs playing a crucial role.

Italy has also established the Numero Verde, a 24/7 national toll-free helpline that provides emergency assistance to trafficking victims. Managed by the Municipality of Venice and coordinated with various public bodies and NGOs, the helpline offers support in multiple languages.

For child victims, Italy's support system includes both short-term and long-term programs. Short-term programs under Article 13 provide immediate protection, including voluntary repatriation assistance or special residence permits. Long-term programs under Article 18 offer comprehensive support such as recovery plans, social integration, housing, health services, and vocational training. Specific protections under Article 4 of Decree Law 24/2014 ensure secure shelters, healthcare, legal aid, and social integration for child victims. The Assisted Safe Return project helps survivors reintegrate into their home countries, reducing vulnerabilities and preventing re-trafficking.

Legal guardianship for unaccompanied or separated children is governed by court decisions, with a 2017 law allowing for voluntary guardianship, typically by specialized lawyers. However, concerns remain about the effectiveness of this system without suf-

ficient expertise, highlighting the need for professionals with a deep understanding of child protection.

The ADITUS project, funded by the Ministry of Internal Affairs and IOM since 2007, enhances the identification and support of trafficking victims, particularly children. The project includes providing information at disembarkation points, training personnel at shelters and centers for unaccompanied minors, and engaging in outreach.

Despite these efforts, GRETA's recommendations and expert opinions highlight critical areas for improvement. Specifically, there is a need to strengthen protections for children during disembarkations, enhance non-punishment measures for trafficking victims, and accelerate and standardize age identification processes. Additionally, Italy must ensure justice for women victims with children, combat labor exploitation more effectively, and improve international cooperation. Implementing these recommendations will further strengthen Italy's response to human trafficking, with a particular focus on safeguarding child victims and improving victim identification and support mechanisms.

3.3.2. Turkey's Comprehensive Framework for Safeguarding Child Victims of Trafficking

Turkey has established a robust legal framework to combat human trafficking, anchored by the Foreigners and International Protection Law No. 6458, adopted in 2013. This legislation aligns with international standards, offering comprehensive protections for trafficking victims, including residence during treatment and care. Turkey became a signatory to the UN Convention against Transnational Organized Crime and its Palermo Protocol in 2003 and accepted the EU Council Convention on Action against Trafficking in Human Beings in 2016. Key legal provisions include Article 80 of the Turkish Penal Code and Articles 48, 49, and 55 of the Foreigners and International Protection Law. These provisions cover various residence permits, including specific ones for trafficking victims, which allow for an initial 30-day permit to aid recovery and decision-making.

The national anti-human-trafficking mechanism is coordinated by the Department for the Protection of Victims of Human Trafficking within the Ministry of Internal Affairs' Presidency of Migration Management (PMM). Established under Law No. 6458, this department oversees victim identification, support services, shelter operations, and voluntary repatriation through the Voluntary and Safe Return Program. The 2016 Regulation on Combating Human Trafficking and Protection of Victims outlines responsibilities for the National Combating Human Trafficking Coordination Commission, focusing on policy development, interagency coordination, and data collection. The National Rapporteur role is designated to the Turkish Human Rights and Equality Institution, separate from DGMM, addressing recommendations for independent oversight.

The YIMER hotline, operated by PMM since August 2015, offers 24/7 support in seven languages and serves as a key resource for trafficking victims and migrants. It provides assistance on visas, residence permits, and emergency issues, consolidating all emergency numbers into the 112 framework for streamlined access to services.

Turkey's Victim Support Program includes emergency and long-term shelter, psychosocial support, case management, and vocational training. Child victims face additional challenges, often due to fear of authorities and labor exploitation in rural areas. Coordination of services involves collaboration with governmental bodies, international organizations, and NGOs, with PMM managing program execution. Victims receive financial assistance, healthcare, and integration services, with the Safe Return Assistance project facilitating voluntary repatriation with transportation costs and reintegration support.

Since 2020, Turkey has identified and directed over 1000 unaccompanied minors to specialized services. The Ministry of Family and Social Services manages guardianship procedures for these children, despite ongoing challenges related to documentation and financial constraints. The Department of Victims' Rights, established in 2013 and restructured in 2020, focuses on providing psychosocial support and ensuring victims' safety during legal proceedings. This includes establishing child-friendly forensic interview rooms in courthouses to facilitate secure testimonies and minimize re-traumatization.

Despite Turkey's ongoing efforts and robust legal framework, GRETA's recommendations and expert opinions highlight critical areas needing improvement, particularly for child victims. There is an urgent need to develop a new national action plan focusing specifically on child trafficking, ensure that children are not punished for crimes committed under coercion, and accelerate and standardize age identification processes. Additionally, Turkey should enhance the capacity of shelters for child victims, improve their access to support and compensation, and strengthen international cooperation to tackle child trafficking more effectively. Addressing these issues will significantly improve Turkey's response to child trafficking, ensuring better protection and support for young victims.

3.4. Country Implementation of Measures to Protect and Promote the Rights of Child Victims of Trafficking

In this section, we will critically examine the implementation of protective measures for child trafficking victims in Turkey and Italy. Through the analysis of expert opinions and firsthand insights, we will assess the effectiveness of these measures, identifying both strengths and shortcomings. This examination will offer a nuanced understanding of how these policies and practices operate in real-world settings, highlighting achievements, challenges, and areas requiring further development. By incorporating expert commentary, this evaluation aims to provide a comprehensive assessment of the impact and efficacy of the protective frameworks and support systems established in both countries.

1. Identification of child victims of trafficking:

Article 10 of the Convention¹ requires Parties to implement measures for identifying trafficking victims by ensuring that authorities have trained and qualified personnel. The identification process is lengthy, so the Convention protects potential victims by stating they must not be removed from the country until the identification is complete and must receive necessary assistance.

In both Italy and Turkey, incorporating NGOs into child trafficking initiatives is crucial for effective victim identification. Migrants, refugees, and unaccompanied minors in these countries often fear deportation or punitive actions when engaging with authorities. NGOs play a critical role in bridging this gap, offering a more approachable and trusted avenue for these vulnerable groups to seek help. For instance, Expert I6 from Italy emphasized the significance of NGO involvement, stating: "In my region, the implementation of the Memorandum of Understanding saw robust support from the NGO On the Road in Italy. Their active involvement has persisted, and their guidance has been invaluable. We collaborated extensively on numerous cases, providing crucial assistance and protection to victims". This underscores the essential role of NGOs in identifying potential victims, particularly as migrants and unaccompanied minors often have concerns about deportation or punitive measures.

A parallel situation is observed in Turkey. Expert T8 from Turkey recounted a case involving Syrian children in Kırıkhan, Türkiye, highlighting the challenges faced when the child's family refused to acknowledge the abuse and fled upon learning of the intended report: "There were Syrian children working in a tea house in Kırıkhan, Türkiye. She was working in a tea house. Then she was raped by her employer at this workplace. During the interviews, the girl's mother insisted that there was a misunderstanding, claiming that it didn't happen the way it was perceived. The child's mental health was deteriorating. Although we attempted to offer psychosocial support, the family became frightened and fled when they learned we intended to report the incident. The mother's sole concern was ensuring that the incident was kept secret, disregarding the child's psychological state. She repeatedly told her child to deny that anything had happened".

Effective outreach programs are integral to identifying and supporting child trafficking victims. Such initiatives involve direct engagement with individuals in vulnerable situations, often starting from a basic level of interaction to provide essential support and opportunities. These programs adopt a human rights-based approach to address severe risks related to illegal activities, including potential violence, disease, and exploitation. In Italy, as noted by Expert I15, outreach efforts involve direct engagement on the streets,

focusing on guiding individuals from a fundamental level and offering protection: "Our organization engages with individuals directly on the streets, guiding them from the ground up until they show tangible progress. We provide opportunities and adhere to a fundamental human rights-based approach. Given that prostitution is illegal in Italy, individuals in this situation are at risk of being criminalized, exposed to violence, diseases, sexually transmitted infections, and theft. Our mission is to offer protection to these individuals. Cultural mediators, well-versed in human rights matters, collaborate with us, and we strive to operate cohesively as a team, sharing a unified philosophy".

Similarly, in Turkey, Expert T12 described how social service centers contribute to identifying potential child trafficking victims through home visits, inspections, and financial assistance: "Social service centers perform home visits, conduct inspections, and offer financial assistance. This initiative has helped identify numerous potential child trafficking victims. The Ministry of Family and Social Services coordinates this program across all provinces in Turkey. While there is typically a reluctance to share detailed information with state institutions, they are willing to disclose basic details, such as the presence of children in the home, when it involves socio-economic support".

In regions with significant tourism industries, such as certain cities in Italy, Nigerian children employed in hotels and restaurants are often subjected to informal or illegal work conditions, heightening their risk of exploitation. Similarly, Syrian children in Turkey face precarious employment situations that expose them to similar threats. Addressing these issues requires targeted outreach and support. Expert I15 from Italy highlighted the following: "In this context, our organization coordinates with companies to combat child trafficking for labor exploitation. Acknowledging that many of these young workers may not speak the local language, we produce informational flyers in various languages, including Nigerian, Arabic, Farsi, and others". Concurrently, Expert T1 from Turkey observed: "Foreigners in Izmir are highly vulnerable to victimization due to their reliance on illegal work, particularly in tourism and entertainment, where many are coerced into prostitution, the most common form of exploitation. Syrian girls are often forced into marriage, while labor exploitation affects boys and girls, especially from Uzbekistan and Turkmenistan, lured by false promises of legal employment. These individuals, often children, endure long hours in inhumane conditions without proper permits or insurance, making them victims of child trafficking".

To effectively combat trafficking, programs must be culturally and religiously diverse to address the varied needs of victims from distinct backgrounds. This approach enhances the identification and support of child trafficking victims. In Turkey, the Turkish Red Crescent operates community centers in 17 provinces with high refugee and migrant populations, providing targeted support and protection. Expert T11 from Turkey noted the following: "There are active community centers across 17 provinces. These centers are mainly located in areas with large Syrian populations. Recently, the program has started to include support for Afghan refugees as well. In neighborhoods with high Syrian populations, Arabic translators are available to help. The program features a protection initiative managed by a specialized coordinator, supported by translators and social workers. It also provides socioeconomic empowerment and includes health professionals, such as psychiatrists and psychologists, for psychosocial and medical support".

Conversely, Expert T22 from Turkey highlighted challenges related to regional differences, stating the following: "Expanding the national system directly poses challenges due to regional differences. For instance, among Syrian refugee children, boys are generally in a more advantageous position compared to girls. Boys in rural areas often face labor exploitation in agricultural work, whereas girls are more likely to experience gender-based violence. Older girls not attending school are frequently exploited at home, tasked with caring for siblings or elderly family members".

In Italy, the National Anti-Trafficking Projects (N.A.ve) consist of 21 initiatives managed by ten distinct private organizations (NGOs). Expert I5 from Italy elaborated the following: "The 21 initiatives collectively form a cohesive project overseen by 10 distinct private organizations (NGOs). Each organization focuses on various facets of support, including specialized

assistance for children, women with children, and other vulnerable groups such as men and boys. Crucially, the project incorporates partners from a range of faiths and nationalities, including religious groups committed to addressing sexual exploitation and advocating for the rights of sex workers and transgender individuals. This diverse collaboration ensures a human rights-based approach, leveraging a broad spectrum of expertise to effectively address the needs of potential child trafficking victims, who come from diverse backgrounds, including refugees, migrants, and unaccompanied minors from multiple countries and continents".

In terms of legislative and institutional frameworks, Italy and Turkey have established robust systems for the protection of child trafficking victims. In Italy, Expert 19 outlined the framework: "According to Article 4 of Legislative Decree 24/2014, which aligns with the 2011 European Directive on Human Trafficking, if there is reasonable suspicion that an individual is a minor, they must be treated as such and provided with all necessary protections for children. The process for determining age involves an initial psychological interview, which must be conducted with the individual's consent. Italy has two distinct laws governing age assessments: one applicable to unaccompanied minors and another specifically for trafficking victims. Additionally, while the penal code (Article 601) addresses the punishment of traffickers, separate legislation deals with sexual exploitation and forced prostitution".

In Turkey, Expert T9 detailed the legal framework: "The PMM handles the victim identification interviews, usually involving a specialist trained in child trafficking and a child psychologist or social worker. Following identification, child victims are placed in the Ministry of Family and Social Services' children's homes under Law No. 5395. Once their victim status is confirmed, both the Ministry and the Migration Administration are responsible for providing protection and support services".

Despite these frameworks, a persistent challenge remains: Officials often fail to recognize or consider that a trafficking victim might be a child. This oversight impacts the identification process significantly. Expert T5 from Turkey noted the following: "Experts often overlook the possibility that trafficking victims might be children. Police and migration officials frequently fail to recognize minors and do not refer them for age identification tests. This oversight leads to these children being placed in deportation centers or facing legal issues as alleged offenders, exacerbating their vulnerability and underscoring the need for better identification practices".

As a result, potential child victims may end up in deportation centers or, in severe cases, become entangled in legal proceedings as alleged offenders. This issue is exacerbated by the fact that many child victims of trafficking are undocumented migrants lacking legal documentation to verify their age. The absence of a formal age identification process complicates the proof of their minor status, increasing their vulnerability and risk of further exploitation or legal consequences. The systemic failure to recognize and address the presence of child trafficking victims underscores a critical gap in protective measures and highlights the urgent need for more effective and consistent identification protocols.

Pushbacks and disembarkation processes are often linked to tragic maritime incidents, involving the removal of individuals from ships and resulting in numerous shipwrecks. Since 2020, Italy has witnessed a series of maritime disasters, with at least 700 children perishing while fleeing dangerous situations and seeking refuge (FRA 2023; Reuters 2023; IOM 2023). Expert I11 from Italy, regarding the difficulties he encountered in identifying victims, outlined the following: "I cannot answer this question without considering pushbacks disembarkation. Because disembarkation is the first step for us when the victims arrive. I think early identification of victims is definitely the main goal we should have because if you can understand that you are dealing with a minor and that this is a victim of human trafficking, you can do anything. But if you cannot understand that you are dealing with a minor at that moment, that child is lost forever".

These tragedies emphasize the hazardous nature of such journeys and the pressing need for effective measures to protect potential child trafficking victims. The significant death toll among these young passengers reflects critical shortcomings in protection and support systems, highlighting the need to prevent such disasters and ensure the safety of unaccompanied minors (UNICEF 2023).

2. Appointing a Legal Guardian for Unaccompanied or Separated Children:

EU legislation mandates that unaccompanied or separated children must be assigned a legal guardian to ensure their protection and well-being. According to Directive 2013/33/EU, member states are required to provide unaccompanied minors with a guardian responsible for their legal and personal matters, acting in the child's best interests. The Dublin III Regulation also underscores the need for proper identification and guardian assignment for unaccompanied minors, while the Qualification Directive stresses additional support for these children during their international protection claims. Overall, these regulations aim to ensure that unaccompanied children receive appropriate guardianship and protection throughout their stay in the EU.

In Italy, the process of appointing legal guardians for unaccompanied or separated children is managed through judicial decisions based on established legal frameworks. The role of legal guardians is pivotal in providing protection and representing the best interests of these children. Expert I4 from Italy described the procedure: "For children who are unaccompanied, the court designates a legal guardian according to legal guidelines. We are also required to interview this guardian and facilitate communication between them and the children. The court has the authority to select the legal guardian. When children arrive in Italy without a family, the court assigns them a guardian. The police also have a role in this process, and often lawyers take on the role of guardians. This situation is common in our area, but unfortunately, we do not have the authority to make these decisions or act as the legal guardians ourselves".

Since the enactment of a new law in 2017, voluntary legal guardianship has been introduced, with lawyers often fulfilling this role, particularly those specializing in human trafficking, criminal law, and asylum protection (European Union Agency for Asylum 2024). However, concerns have been raised about the effectiveness of voluntary guardianship without sufficient expertise. Expert I8 from Italy noted the following: "This law is highly effective because it ensures both protection and authority for unaccompanied children across Italy. It also addresses the role of voluntary legal guardians. As lawyers, we serve as voluntary, specialized legal guardians in this context". Expert I11 further emphasized the need for specialized expertise: "This law was crucial because it addressed the shortage of legal guardians and the high interest in the role. However, handling cases like that of a 16-year-old Nigerian trafficking victim requires more than just any guardian. It's essential to select someone with expertise in human trafficking, criminal law, and asylum protection. A specialized lawyer, well-versed in these complex issues, is needed to effectively manage such cases".

The importance of well-trained and specialized experts in child trafficking cannot be overstated. These professionals possess the essential expertise required to navigate the intricate legal and psychological challenges of protecting and supporting victims. Unlike general practitioners, specialists in child trafficking are equipped with the knowledge necessary to address the multifaceted nature of trafficking cases, ensuring that each child receives tailored care and legal support. Their proficiency in relevant laws and their ability to respond to the unique needs of trafficking survivors are crucial for delivering effective interventions and fostering long-term recovery and justice. Expert I8 commented on Italy's child protection system: "I believe the child protection system in Italy is quite effective. I would eliminate the requirement for voluntary legal guardians, as it seems merely symbolic. Instead of relying on well-meaning individuals, what we need are skilled and knowledgeable professionals".

Italy's recent legal reform allowing individuals from diverse backgrounds to voluntarily apply as legal guardians aims to ease system burdens and expedite procedures. However, Expert I8 criticized this approach, suggesting it is symbolic and may not effectively address the needs of child victims: "This policy amounts to little more than a symbolic gesture aimed at well-meaning but uninformed individuals. Such an approach, which resembles charity rather than professional care, is unlikely to yield positive results. Legal guardians must be well-versed in the law, and personal opinions should not override legal requirements". As extensive literature indicates, child protection, including the legal guardianship of unaccompanied minors, should be entrusted to experienced professionals such as social workers, psychologists, and lawyers (Hanson 2014; Lachman et al. 2002; Munro 2010).

In Turkey, the Ministry of Family and Social Services oversees procedures related to unaccompanied or separated foreign children, with a significant number coming from Syria and Afghanistan. Challenges arise in documenting guardianship status, particularly when children arrive without proper documentation. Experts 1, 9, and 12 have noted that many children arrive from Afghanistan or pass through Iran, facing difficulties in providing evidence of guardianship due to inadequate documentation. Financial constraints further complicate this process, with additional costs for translation and notarization. Istanbul, particularly areas like Zeytinburnu, sees a concentration of Afghan and Somali nationals, exacerbating these challenges.

UNHCR and other international organizations often assist with the legal guardian process. Expert T3 reported the following: "The most common cases we encountered involved Afghan and Somali nationals, particularly unaccompanied children". Expert T21 highlighted the difficulties faced: "Most arrivals either lack documents or have questionable documents from their home countries, such as Afghanistan. Costs for translations and notarizations add to the difficulty, given their low living standards and limited financial resources. Although those with passports or proper documents can resolve these cases, the system does not function efficiently".

Despite these challenges, Turkey's state policies generally function well in protecting unaccompanied children, guided by the Child Protection Law No. 5395. Professionals, including social workers and psychologists, play a crucial role in ensuring legal guardianship in line with international guidelines (Lachman et al. 2002; Munro 2010; Wulczyn et al. 2010).

3. Assistance to child victims of trafficking:

Article 12 of the Convention requires Parties to implement measures to assist trafficking victims in their physical, psychological, and social recovery. This assistance must be provided with consideration for the victim's safety and protection needs, in cooperation with NGOs and other relevant organizations. The support must be consensual and informed, accommodating the special needs of vulnerable individuals, including children, and should not be dependent on the victim's willingness to act as a witness. Additionally, the Convention stipulates that assistance must include appropriate and secure accommodation, as outlined in Article 14 regarding temporary residence permits and Article 12(7) concerning child victims.

Effective social protection and victim support programs must be highly individualized to address the diverse needs of child victims of trafficking. These needs vary significantly based on factors such as age, gender, cultural background, type of exploitation, and the duration of their exploitation. Complications arise with irregular migrants or unaccompanied minors, necessitating tailor-made programs rather than a one-size-fits-all approach. Comprehensive support systems must be designed to meet each victim's specific needs to maximize their chances for recovery and reintegration.

In Italy, the support system for child victims of trafficking includes a variety of specialized shelters and individualized services. Expert I7 explains as follows: "We operate approximately ten different shelters, each varying significantly in its setup. Some, known as 'comunità', offer 24-h support with social workers residing on-site. Others resemble standard apartments, where 3–4 individuals share the space, and social workers visit weekly to conduct activities and meetings. The support provided is tailored to the individual's readiness for employment, with job training commencing when appropriate. The approach varies based on factors such as age—whether the individual is a minor or an adult—and their duration of stay in Italy. Working with someone who has recently arrived from another country is distinct from working with someone who has lived in Italy for several years or with someone from another European nation. Consequently, we develop customized services for each individual, which we refer to as a social protection and support project".

In contrast, Turkey's system reveals significant deficiencies. There are no specialized shelters for child trafficking victims; instead, these children are placed in general institutional care facilities alongside peers from various backgrounds without targeted interventions. Expert T21 from Turkey notes the following: "Classifying children as victims of trafficking presents a delicate issue. The Ministry of Family intervenes directly, but there are no specialized shelters for these child victims. Instead, they are placed in regular facilities, sharing

space with other children without any specialized care. This has been officially confirmed, and it applies equally to Turkish children and those from other backgrounds".

Italy's approach includes a specialized framework for children who are victims of trafficking or who accompany victimized parents. Expert I7 elaborates as follows: "There are distinct accommodation structures for children compared to adults. Under Italian law, children are governed by the child protection system's rules and regulations. While the broader anti-trafficking framework in Italy does not specifically address child victims, we operate within the child protection laws or, in some cases, the juvenile justice system. Children must be integrated into the child protection system, where, if legal guardians are present, they assume responsibility; otherwise, teams including appointed guardians, social workers, lawyers, educators, and psychologists are engaged. Our role involves collaborating with the child protection system to reconstruct the child's migration history, identify trafficking, and assess their risk level".

Conversely, Turkey lacks specialized child-focused accommodations and support mechanisms. Institutional facilities do not provide the targeted interventions needed for effective protection and recovery.

The Inside-Out project in Italy, managed by the Municipality of Venice, addresses victims coerced into illegal work. Expert I7 describes the following: "To date, we have engaged with 300 different children and young adults through this project. Although the number of cases is small, they are notably challenging, with many victims suffering from sexual abuse or forced involvement in criminal activities. Since 2009, we have collaborated with the juvenile prison in Veneto, conducting interviews with incarcerated minors to determine if they are trafficking victims and whether they are compelled to commit crimes. We assess their risks and decide if they should return to their communities after their legal proceedings". This initiative supports individuals transitioning from incarceration to adulthood, addressing vulnerabilities and providing comprehensive support, including education, legal documentation, language skills, and employment. However, challenges persist due to criminal influences and familial threats.

Turkey's lack of specialized shelters and tailored support results in significant vulnerabilities. Expert I7 emphasizes the need for thorough interviews and long-term assessments to address exploitation, particularly of children: "Traffickers often exploit individuals, particularly children and young people, for forced involvement in illegal activities (UNODC 2022)". To address this issue effectively, it is crucial to conduct thorough interviews and long-term assessments of those suspected of such exploitation within the criminal justice system. Expert I7 emphasizes that these individuals may struggle to disclose their true situation due to threats and pressure from traffickers (Europol 2016). Furthermore, victims of child trafficking who have not been formally recognized as such cannot access victim protection programs, leaving them vulnerable upon release from incarceration and at high risk of re-victimization (DePrince 2005; Farrell 1995; Grauerholz 2000; Park and Monaghan 2022).

In Italy, Expert I10 highlights the dedicated support for child victims of trafficking and unaccompanied migrant children. This includes employment and educational projects to promote self-sufficiency upon reaching adulthood: "Legally, individuals become adults at 18 and must leave the program. For instance, a 16-year-old has two years before turning 18, during which they are part of the program. While I support them as much as possible, the law permits young adults to remain for up to two years, with potential for extension. However, their needs shift significantly as adults, and economic support alone is insufficient. Finding employment becomes crucial. Therefore, priority is given to housing, job placement, language courses, and vocational training".

Turkey's approach focuses on respecting and supporting each victim's individual wishes, adhering to a child-centered and survivor-centered approach. Expert T20 states the following: "Our primary focus is on respecting and supporting each victim's individual wishes, adhering to a child-centered and survivor-centered approach. We do not impose our own preferences but tailor our support to their specific requests. Currently, psychological support is crucial, and we facilitate this through an appointment system, with psychologists providing assistance in Arabic for refugees".

The Penelope Association in Italy implements a tiered shelter system tailored to various needs. Expert I12 explains as follows: "Our project includes various shelters designed to address different stages of need. We have emergency centers for immediate crisis situations, secondary homes where individuals begin to gain independence, and finally, options for living independently in their own homes".

Effective outreach programs are vital for identifying potential child victims of trafficking, particularly those in vulnerable situations. NGO Proxima plays a critical role by offering services such as breastfeeding support, food distribution, health check-ups, and clothing. Expert I3 from Italy highlights the following: "Our state-defined program has three main components: visibility, assistance, and social cohesion. The visibility component aims to help potential or current child victims of trafficking come forward through discreet outreach efforts. Street units provide essential services like health care, food, and clothing to girls and women in prostitution, building trust and encouraging them to seek help. The assistance component offers shelter and support through facilities in Ragusa, Sicily, with services extending to other cities. Shelters operate in three stages, starting with high-security accommodations and gradually transitioning to less restrictive settings as safety improves. This phased approach supports child victims in moving from immediate protection to successful reintegration".

Finally, T22 summarizes the Turkish Red Crescent's employment-oriented programs under the Socio-Economic Empowerment Program. "These programs offer various training options, including sewing, on-the-job training with employment guarantees, and agricultural activities like vegetable and small livestock farming. Additionally, participants learn skills in carpet weaving and assembly work. Recent funding has emphasized integration and cooperative development".

4. Comprehensive approach and co-ordination

One of the Convention's objectives is to create a comprehensive framework for the protection and support of victims and witnesses. To ensure effective national efforts against human trafficking, these initiatives must be integrated and multi-sectoral, incorporating essential multidisciplinary expertise. Article 29(2) mandates that Parties take steps to coordinate national policies and actions against human trafficking, including the establishment of specific coordinating bodies. Furthermore, Article 35 highlights the need for collaboration with civil society through strategic partnerships and cooperative frameworks to assist governments in fulfilling their obligations under the Convention.

Expert I11 from Italy suggested that collaboration is essential for effective identification. Drawing on the poet's idea that "no one is an island²," I11 argued that tasks should not be conducted in isolation but through a coordinated effort where mutual respect and support for each other's roles and responsibilities are paramount: "So, the best way to do this is to work together. You may know, there was a poet who said 'no one is an island,' we don't need to think that everyone should do their job at their desk, no, we should work together, everyone should respect each other's duties, functions and tasks".

In contrast, Expert I6 pointed out the disparity in roles and influence between NGOs and government officials in combating human trafficking in Italy. NGOs, while crucial in victim assistance and leading regional projects, have limited decision-making power compared to government officials from the Ministry of the Interior. Despite their significant involvement in identifying, assisting, and protecting victims, their influence is restricted to legal and administrative matters, such as residence permits and shelter placement. The uneven collaboration across the country, with occasional tensions involving former prosecutors and inspectors, highlights the need for improved coordination.

In the context of service delivery, employing individuals familiar with regional needs is both effective and efficient. However, Expert I6 noted the following: "In certain areas, NGOs exhibit limited activity, leading to regional disparities". The scarcity of NGO structures in some regions exacerbates these disparities, affecting the consistency and quality of services provided.

Addressing child trafficking necessitates a multidisciplinary approach, integrating various expertise to manage the complex needs of victims. Expert I15 highlighted the

importance of this approach, noting that before the pandemic, anti-trafficking personnel, labor inspectors, and cultural mediators collaborated on-site to oversee operations: "We strive to engage in multidisciplinary and multitasking efforts with various organizations. A thorough investigation is necessary to uncover and address the issues effectively".

Expert I8 added that annual meetings among Italian organizations are crucial for developing standardized practices and improving cooperation. These meetings focus on creating 'dictionaries' for terminology and procedures, which is vital given the significant differences between cities like Milan and Naples: "We also strive to engage organizations not currently involved in the projects and collaborate with international protection agencies and the Ministry of the Interior".

In Turkey, while international organizations, unions, and NGOs are not permanent members of the National Coordination Commission, they may be invited to its meetings. Expert 13 elaborates as follows: "In 2017 and 2018, organizations such as Ankara Municipality, the Human Resource Development Foundation, the Turkish Red Crescent, IOM, and ICMPD participated in these meetings. The Coordination Commission is scheduled to meet annually, with additional meetings as needed. During the initial meetings in 2017 and 2018, two sub-commissions were established to address child trafficking and labor exploitation".

In Turkey, Expert T6 described the collaboration with relevant public institutions, international organizations, and NGOs to ensure that victims of human trafficking receive justice and compensation. However, the response to human trafficking in Turkey primarily relies on public institutions' services and programs. The limited involvement of NGOs in the national coordination mechanism and the overall inadequate collaboration highlight the need for significant improvements in these areas to enhance the effectiveness of the national response.

4. Discussion

Addressing child trafficking requires a multifaceted approach that integrates victim assistance, comprehensive coordination, and robust legal frameworks. Both Italy and Turkey have made strides in tackling this issue, yet they face distinct challenges and opportunities for improvement.

4.1. Assistance to Child Victims of Trafficking

Effective assistance to child victims of trafficking is essential for their recovery and protection. The Convention mandates measures to aid victims' physical, psychological, and social recovery, emphasizing safety and protection while ensuring that support is consensual and informed (Council of Europe 2005).

Italy has made significant progress in providing specialized assistance to child victims of trafficking. The country offers a range of services, including emergency shelters, transitional housing, and specialized support tailored to the varying needs of children based on age, gender, and type of exploitation. For instance, the Inside-Out project supports victims transitioning from incarceration to adulthood by providing educational and employment opportunities (Inside-Out 2023). However, there is room for improvement in ensuring consistent, high-quality support across all regions. Italy must also further prioritize child safety in maritime operations and enhance the system for age identification to prevent children from being unjustly penalized (GRETA 2024).

In contrast, Turkey's system reveals significant deficiencies. Child trafficking victims are often placed in general institutional care facilities lacking specialized support, which can exacerbate their vulnerabilities and hinder effective recovery (UNICEF 2022). The lack of specialized shelters and tailored interventions highlights a critical gap. Victims frequently face the risk of being treated as illegal immigrants and deported, compounding their trauma and vulnerability to re-victimization (ECPAT 2023). To address these challenges, Turkey must reevaluate its approach under the Dublin Convention and develop specialized support frameworks to address these gaps effectively (Dublin Regulation 2013).

4.2. Comprehensive Approach and Coordination

A comprehensive approach to combating human trafficking necessitates effective coordination among various stakeholders, including NGOs, law enforcement, healthcare professionals, and other entities.

Italy has demonstrated progress with its integrated approach involving NGOs, law enforcement, and social services (IOM 2022). However, challenges persist, such as disparities in NGO influence and inconsistencies in regional service delivery. Strengthening the decision-making power of NGOs and addressing regional disparities in support services are crucial for improving Italy's response (UNHCR 2022). Furthermore, a more child-centered, survivor-centered, and gender-sensitive approach should be endorsed to ensure that interventions are tailored to the specific needs and vulnerabilities of child victims, promoting a more effective and compassionate response (International Labour Organization 2023).

In Turkey, the coordination mechanism includes public institutions, international organizations, and NGOs but lacks permanent NGO involvement in the National Coordination Commission (GRETA 2019b). Enhancing NGO participation and fostering a more inclusive approach will be essential for improving Turkey's national response. Greater integration of NGOs and broader stakeholder engagement can significantly bolster the effectiveness of anti-trafficking efforts (Global Initiative Against Transnational Organized Crime 2021). Turkey should also embrace a child-centered, survivor-centered, and gendersensitive approach to better address the unique needs of trafficking victims and ensure that support services are both inclusive and sensitive to the diverse experiences of survivors (UNICEF 2023).

4.3. Legal Frameworks and Victim Compensation

Legal frameworks play a vital role in addressing human trafficking and ensuring victims' access to justice and compensation.

Italy's approach includes a state-funded compensation mechanism, which serves as a practical model for supporting trafficking victims (Italian Ministry of Justice 2023). However, there are areas for improvement, such as ensuring that all victims, especially children, receive consistent and effective support (GRETA 2024). Adopting a more child-centered and survivor-centered approach can enhance the effectiveness of these mechanisms, ensuring that the specific needs of young victims are adequately addressed (ECPAT 2023).

Turkey faces legal ambiguities and practical obstacles that hinder victims' access to compensation (Human Rights Watch 2023). The conflation of trafficking with related crimes and procedural barriers create challenges for victims seeking redress. Addressing these legal gaps and enhancing judicial knowledge of trafficking crimes are essential for improving Turkey's response. Implementing more accessible compensation mechanisms and addressing systemic barriers such as language difficulties and fear of traffickers are crucial for enabling victims to pursue compensation and engage effectively with legal processes (Turkey Ministry of Justice. 2024). Embracing a survivor-centered and gender-sensitive approach in legal frameworks will ensure that victim support systems are comprehensive and inclusive (UN Women 2022).

5. Conclusions

In addressing human trafficking, both Italy and Turkey confront distinct challenges, particularly in relation to child victims, yet they also possess significant opportunities for enhancement. For Italy, increasing the decision-making power and integration of nongovernmental organizations (NGOs) within national policies is crucial to ensuring that the specific needs of child victims are effectively addressed (IOM 2022). Addressing regional disparities in support services through consistent NGO activity is imperative, especially in regions with high numbers of vulnerable children (UNHCR 2022). Moreover, Italy must prioritize safeguarding children during maritime operations, enhancing international cooperation to prevent child fatalities in crossings, and streamlining age identification processes to prevent minors from being unfairly treated as adults (Save the Children 2021;

GRETA 2024). The adoption of a child-centered, survivor-centered, and gender-sensitive approach is essential. Such an approach ensures that interventions are tailored to the unique needs of child victims, thereby enhancing the effectiveness of support systems and integrating children's perspectives into policy and practice (International Labour Organization 2023).

Turkey, on the other hand, faces the pressing challenge of improving NGO involvement by ensuring their permanent role in the National Coordination Commission and other relevant bodies, which is crucial for enhancing the national response, particularly in relation to child trafficking (GRETA 2019b). Turkey must also reevaluate its approach under the Dublin Convention to standardize and improve the effectiveness of victim identification and support mechanisms, ensuring that child victims are not overlooked or inadequately supported (Dublin Regulation 2013). Establishing specialized shelters and tailored support services for child trafficking victims is critical, as these facilities must be designed to meet the specific and often complex needs of children who have been trafficked (UNICEF 2022). Furthermore, Turkey must adopt a child-centered, survivor-centered, and gender-sensitive approach to ensure that its support systems are inclusive, responsive, and particularly attentive to the vulnerabilities of child victims, especially those from marginalized groups (UNICEF 2023).

Both Italy and Turkey are urged to develop and implement new National Action Plans that incorporate robust evaluation systems and harmonized National Referral Mechanisms (NRM), with a particular emphasis on combating child trafficking and protecting child victims. These plans must address all forms of exploitation, with specific strategies for protecting children, immigrants, and refugees (GRETA 2019a, 2019b; UN Special Rapporteur 2020). The recommendation by GRETA to appoint a "National Rapporteur" to oversee state institutions and national coordination efforts is being progressively implemented by both countries, albeit at different paces, and must include a strong focus on child protection (GRETA 2019a, 2019b; UN Special Rapporteur 2020).

Enhancing the integration of guardianship systems for unaccompanied children, expanding specialized support for trafficking victims, particularly children, and improving coordination among all stakeholders are critical steps for both nations. Addressing these areas, coupled with comprehensive social protection policies, will significantly strengthen the response to child trafficking. Italy's success in public awareness campaigns, especially those targeting child trafficking, highlights the importance of targeted information dissemination, which Turkey could emulate to increase national-level stakeholder involvement and build capacity (Save the Children 2021; Global Initiative Against Transnational Organized Crime 2021).

Finally, addressing the challenges posed by irregular migration and adopting comprehensive policies that incorporate child protection considerations are crucial for effectively combating human trafficking. Both countries, due to their strategic locations on Mediterranean migration routes, face significant pressures—Italy as a primary entry point under the Dublin Regulation and Turkey as a host to millions of refugees amidst ongoing regional conflicts—making child protection an urgent priority (IOM 2022; UNHCR 2022). By refining legal and support frameworks with a child-centered focus and fostering a collaborative approach that integrates various sectors and stakeholders, Italy and Turkey can build a robust, multi-faceted response to human trafficking. The ultimate goal is to ensure that every child victim receives the tailored care and assistance necessary for recovery and reintegration, thereby offering more effective protection and support and safeguarding the most vulnerable in society.

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Notes

Council of Europe Convention on Action against Trafficking in Human Beings and its Explanatory Report (Warsaw, 16.V.2005), https://www.coe.int/en/web/anti-human-trafficking/anti-trafficking-convention (accessed on 3 April 2024).

No man is an island, entire of itself; every man is a piece of the continent, a part of the main.

If a clod be washed away by the sea, Europe is the less, as well as if a promontory were, as well as if a manor of thy friend's or of thine own were.

Any man's death diminishes me, because I am involved in mankind; and therefore never send to know for whom the bell tolls; it tolls for thee". John Donne

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