

POLAND (Tier 1)

The Government of Poland fully meets the minimum standards for the elimination of trafficking. The government continued to demonstrate serious and sustained efforts during the reporting period; therefore, Poland remained on Tier 1. These efforts included investigating more trafficking crimes, convicting more traffickers, and providing extensive anti-trafficking training for front-line officials. Additionally, the government identified more victims and referred significantly more victims to services. The government updated its victim identification SOPs to provide clearer guidance to law enforcement officials encountering potential trafficking victims, approved and implemented the country's first NRM to improve victim identification and referral to services, and drafted an updated NAP. Although the government meets the minimum standards, it prosecuted fewer traffickers and decreased funding for victim protection. Additionally, the government lacked a central mechanism to track law enforcement statistics and did not consistently disaggregate law enforcement data between sex and labor trafficking, undermining the government's ability to assess the scope of the problem and the efficacy of law enforcement efforts.

PRIORITIZED RECOMMENDATIONS: Increase efforts to proactively identify trafficking victims by screening for trafficking indicators among vulnerable populations, and train officials on the use of the newly established NRM. * Increase funding for victim services. * Ensure appropriate victim assistance and protection services for child victims, including unaccompanied children, train additional officials to conduct child victim-witness interviews in a trauma informed, child-friendly manner. * Increase training for prosecutors and judges on the importance of prosecuting under the anti-trafficking statute, the severity of trafficking crimes, and a trauma-informed, victim-centered approach to conducting trials. * Take steps to eliminate all recruitment or placement fees charged to workers by labor recruiters and ensure employers pay any recruitment fees and related processing fees. * Improve central operational coordination and data collection for anti-trafficking activities. * Strengthen the capacity of the National Labor Inspectorate (NLI) to identify victims of labor trafficking and refer them to

services. * Ensure trafficking cases are handled by prosecutors with specialized training on trafficking crimes. * Improve victims' ability to access court-ordered restitution in criminal cases and compensation through civil proceedings. * Increase survivor engagement, including by including survivor input when forming policies, programs, and training, and establishing accessible mechanisms for receiving and providing compensation for such input.

PROSECUTION

The government increased anti-trafficking law enforcement efforts.

Article 189a of Poland's penal code criminalized sex trafficking and labor trafficking and prescribed penalties of three to 20 years' imprisonment. These penalties were sufficiently stringent and, with respect to sex trafficking, commensurate with those prescribed for other grave crimes, such as rape. In addition, Article 203 criminalized inducing an adult into "prostitution" through force, fraud, or coercion and prescribed penalties of two to 15 years' imprisonment. Article 204.3 criminalized inducing a child into "prostitution" and prescribed penalties of one to 10 years' imprisonment.

The government lacked a central mechanism to cross-reference and consolidate law enforcement statistics and did not consistently disaggregate sex and labor trafficking data. In 2024, Law enforcement authorities initiated 23 investigations under Article 189a – four for sex trafficking, 15 for labor trafficking, and four for unspecified forms of trafficking – compared with 20 investigations in 2023. Prosecutors initiated 26 investigations under Article 189a (18 in 2023) and prosecuted 29 defendants under Article 189a, a decrease from 45 prosecutions in 2023. The police initiated 11 investigations, and prosecutors indicted four defendants under Article 203 and/or Article 204.3. In 2023, police initiated one investigation, and prosecutors indicted four defendants under Article 203. The National Prosecutor's Office (NPO) reported courts convicted 20 traffickers under Article 189a, an increase compared with 10 convictions in 2023. Judges issued sentences ranging up to five years' imprisonment; two convicted

traffickers received suspended sentences. Additionally, courts convicted six perpetrators under Articles 203 and 204.3, compared with 12 convictions in 2023. The government continued to report law enforcement efforts to address allegations of complicity by government officials in trafficking-related crimes. Courts convicted a government employee at a youth facility under article 189a and 202.3 (child sexual abuse materials), and prosecutors reported four ongoing investigations involving alleged complicit officials. The government reported it continued to investigate the director of a provincial labor office married to the owner of a job recruitment agency that was allegedly involved in the forced labor of foreign nationals in multiple factories.

The National Police maintained an anti-trafficking department with 10 officers, along with 16 regional offices, each with three to eight officers investigating trafficking, among other crimes. The Central Bureau of Investigations maintained an anti-trafficking coordinator at its headquarters and in each of its 17 regional branches, and the Border Guard (SG) operated a specialized central team and had nine regional anti-trafficking coordinators. Eleven NPO branches, 11 regional prosecutorial offices, and 33 district prosecutorial offices all had a trafficking expert to assist local prosecutors and who could assume responsibility for more complex cases. The government continued to provide extensive anti-trafficking training for police, border guards, prosecutors, judges, consular officers, asylum officers, social workers, crisis intervention center staff, and labor inspectors on various topics, including victim identification, trauma-informed prosecutions, and combating forced labor. The government continued to collaborate with international organizations, including with EUROPOL and INTERPOL, and foreign authorities, particularly Moldova and Ukraine, on international trafficking investigations. The National Prosecutor's Office continued to participate in three joint investigation teams to facilitate international law enforcement cooperation, and authorities responded to requests from foreign governments for extraditions.

PROTECTION

The government increased victim protection efforts.

The government identified 97 victims, compared with 88 victims identified in 2023. Of the 97 victims identified, traffickers exploited seven victims in sex trafficking and 90 in labor trafficking, including seven in forced begging and two in forced criminality. The majority of victims identified were foreign nationals, including from Colombia, Argentina, Turkmenistan, Ukraine, Venezuela, Peru, Moldova, and Russia; 67 were male, and 30 were female. The National Police and SG used SOPs to identify and refer victims; these SOPs included tools to identify child victims and potential victims among vulnerable groups and during the asylum process. In 2024, the government updated the trafficking reporting documents of the SOPs to better clarify the steps law enforcement official should take when identifying a potential trafficking victim. The government approved an NRM for the identification and referral of victims to protection services. Authorities reported screening individuals from vulnerable populations, including individuals in commercial sex, migrants, and asylum-seekers during law enforcement operations and at detention facilities. Despite these efforts, international organizations and civil society continued to criticize the SG for “pushbacks” of migrants and asylum-seekers, including potential trafficking victims, into Belarus; such pushbacks potentially increased vulnerability to trafficking, exacerbated distrust of foreign officials, and deterred potential victims from reporting trafficking crimes or seeking assistance. Civil society reported effective cooperation with the National Police and SG on victim referral procedures.

The government and NGOs reported referring all victims to government or NGO services. Authorities referred 78 victims to care facilities, a significant increase compared with 49 referrals in 2023. The National Intervention-Consultation Center for Victims of Trafficking (KCIK), run by two government-funded NGOs, provided assistance to 289 potential victims (295 in 2023), including 21 victims of sex trafficking, 191 victims of labor trafficking, and 77 victims of other types of exploitation related to trafficking; 113 were female and 176 were male, 173 were adults and 16 were children, and 277 were foreign victims. KCIK provided Polish and foreign national adult and child victims with medical and psychological care,

shelter, legal counseling, welfare support, reintegration services, and referrals to orphanages and foster care for child victims. The government allocated 1.5 million zloty (\$365,141) for victim services to two NGOs that run KCIK, a decrease compared with 1.7 million zloty (\$413,827) in 2023. KCIK operated two shelters for adult female victims, including one for women with children and a small shelter for men, and it rented apartments for victims who did not prefer shelters. The government allowed victims to seek employment and work while receiving assistance and to leave the shelters at will and unchaperoned; shelters and housing were available for victims with disabilities. An expert noted shelter capacity for male victims was insufficient given the increasing number of male labor trafficking victims. The government provided specialized shelter to 62 victims in 2024 (70 in 2021). The government could also provide victims general assistance (social, medical, psychological, and legal) in 170 crisis intervention centers operated and funded by local governments, 27 of which maintained staff trained on assisting trafficking victims; KCIK arranged accommodations for 97 victims using crisis centers and other locations (72 in 2023).

Experts expressed concern the national system for child victim assistance did not properly address the needs of unaccompanied children and noted the government placed unaccompanied child victims in foster families or orphanages unprepared to assist child victims. The Polish government continued to require all unaccompanied children, including potential trafficking victims, entering Poland from Ukraine be provided a court-appointed temporary guardian authorized to represent the child and exercise custody over the child and the child's property and maintained a register of all unaccompanied children coming from Ukraine. Ukrainian caregivers who were unlicensed in Poland oversaw this parallel system; Polish authorities only transferred the most severe cases of reported abuse to the Polish national child protection system for partial oversight, hindering overall protection for child trafficking victims who did not receive specialized care.

Foreign trafficking victims were legally entitled the same benefits as citizens with the exception of comprehensive healthcare. When a foreign victim

required medical treatment, KCIK covered the medical expenses. All non-European Economic Area (EEA) victims were entitled to social welfare benefits, including crisis intervention assistance, shelter, meals, necessary clothing, and financial assistance. Victims from the EEA had access to the full scope of welfare benefits offered to Polish citizens if they could prove habitual residency. The government granted foreign adult victims a three-month reflection period, during which they could stay legally in Poland to decide whether to participate in criminal justice proceedings; 97 victims used this benefit in 2024. Foreign adult victims were eligible for a temporary residence permit – valid for up to three years – which entitled them to work, and could apply for permanent residency, though both benefits were contingent upon participation in criminal justice proceedings; authorities granted residence permits to 56 foreign victims. The government granted a four-month reflection period to child victims and did not require child victims to participate in criminal proceedings to receive a residence permit. The government coordinated with an international organization to repatriate 26 foreign victims. Polish law permitted victims to provide testimony via video or written statements; audio-video recording of testimony was obligatory for victims younger than 15 and for victims of sex crimes, including sex trafficking. The government required judges interview children in the presence of a psychologist. A government-funded NGO provided legal assistance to 161 victims in 2024. Experts reported some law enforcement and prosecutorial interview techniques lacked a trauma-informed approach. Due to new training requirements, some family court judges received training on child-friendly, victim-centered, or trauma-informed interviewing techniques. The government reported courts awarded restitution in three criminal cases (four in 2023).

PREVENTION

The government increased prevention efforts.

The Inter-Ministerial Team for Counteracting Human Trafficking coordinated the government's anti-trafficking efforts; the Deputy Minister of Interior served as the team's chair, and the Deputy Commander of the National Police as deputy chair. The team included civil society representation and

was tasked with evaluating the implementation of anti-trafficking efforts and projects, including the 2022-2024 NAP, and preparing annual reports. The Inter-Ministerial Team met twice in 2024, and two working groups – one to monitor NAP implementation and another focused on victim protection – each met once. Additionally, provincial-level interagency anti-trafficking teams met twice. The government continued to implement its 2022-2024 NAP and drafted and updated a 2025-2027 NAP; the updated NAP was approved by the Council of Ministers on March 19, 2025. The government, in conjunction with the Council of Baltic Sea States, participated in a research project with the objective of providing an overview of developments, trends, and challenges related to sex trafficking in the Baltic Sea region. The government maintained a web portal with relevant statistics, publications, and information on victim assistance. The government provided awareness-raising materials in various languages, including Ukrainian, Spanish, English, and Vietnamese. The government launched an awareness campaign to combat labor trafficking. The campaign distributed materials to provincial offices and the National Police Criminal Bureau, in addition to providing materials to provincial anti-trafficking teams and a partner NGO. A government-funded NGO operated a 24-hour trafficking-specific hotline; the hotline conducted 3,301 consultations, which led to 174 referrals for further assistance. The hotline did not maintain statistics on how many calls were trafficking-related or resulted in investigations and victims identified.

Local authorities could ban employers previously convicted of trafficking from hiring foreign nationals. The law prohibited recruitment fees for employment within Poland and abroad, but recruitment agencies could charge fees for four categories of expenses to secure work abroad: to cover transportation, visas, medical examinations, and translation of documents. NLI referred 74 job recruitment agencies to local authorities for operating illegally (85 in 2023), and the government removed 38 job recruitment agencies from the official registry of legally operating recruitment agencies (33 in 2023). NLI conducted 516 inspections of 488 job recruitment agencies (492 in 2023). NLI reported continued worker “outsourcing,” in which employers evaded certain provisions of the law on temporary workers by

“outsourcing” labor through recruitment agencies or other business entities. NLI expressed concern this increased vulnerability to trafficking among migrant and temporary workers, and that “outsourcing” was not fully regulated in law nor was NLI able to apply administrative penalties in such instances. In November 2024, the Chief Labor Inspectorate trained 71 labor inspectors on combating and preventing trafficking, with a focus on forced labor. NLI inspections led to two referrals to local prosecutors for potential trafficking, including one that remained under investigation at the end of the reporting period. Polish law allowed foreign nationals with a combined residence and work permit to change employers or positions within a company without seeking a new residence permit; however, foreign nationals without the combined permit were required to seek a new work permit. The government implemented its 2022-2025 Government Procurement Strategy, under which the government must consider whether forced labor was used when deciding to grant a contract. The government did not provide anti-trafficking training to its troops prior to their deployment as peacekeepers. The government did not make efforts to reduce the demand for commercial sex acts.

TRAFFICKING PROFILE: Trafficking affects all communities. This section summarizes government and civil society reporting on the nature and scope of trafficking over the past five years. Human traffickers exploit domestic and foreign victims in Poland, and traffickers exploit Polish victims abroad. Traffickers exploit Polish women and children in sex trafficking in Poland and in Europe, particularly Western Europe. Traffickers exploit men and women from Poland in labor trafficking in Europe, primarily Western and Northern Europe, and particularly Germany, the Netherlands, Norway, Sweden, and the UK. Traffickers exploit women and children, particularly from Colombia, Guinea, Bulgaria, Kyrgyzstan, and India, in sex trafficking in Poland. The country served as a transit zone for women and children, particularly from Ukraine, exploited in sex trafficking elsewhere in Europe. Labor trafficking is the predominant form of trafficking in Poland; victims originate from Central and South America – particularly Colombia, Guatemala, Mexico, and Venezuela – and from Europe, Asia, and Africa. Traffickers exploit migrants among Poland’s growing Ukrainian, Belarusian, Bulgarian, Moldovan, Thai,

and Vietnamese populations in labor trafficking, particularly in agriculture, restaurants, construction, domestic servitude, and the garment and fish processing industries. Poland hosts the second largest number of Ukrainian refugees in Europe; approximately 999,700 Ukrainian refugees, predominantly women and children fleeing the Russia-Ukraine war, remain in Poland at the end of the reporting period under temporary protection and are particularly vulnerable to trafficking. Unaccompanied children and children in institutionalized care in Poland are vulnerable to trafficking. Traffickers exploit Romanian men, women, and children, particularly Roma, in forced begging in Poland; persons with disabilities are particularly vulnerable.

2025-2026 Anti-Trafficking Action Plan for Poland

Below please find recommendations for specific goals and objectives to further the Government of Poland's anti-trafficking efforts over the next year:

1. Increase efforts to proactively identify trafficking victims by screening for trafficking indicators among vulnerable populations, and train officials on the use of the newly established NRM.
 2. Increase funding for victim services.
 3. Ensure appropriate victim assistance and protection services for child victims, including unaccompanied children, train additional officials to conduct child victim-witness interviews in a trauma informed, child-friendly manner.
 4. Increase training for prosecutors and judges on the importance of prosecuting under the anti-trafficking statute, the severity of trafficking crimes, and a trauma-informed, victim-centered approach to conducting trials.
 5. Take steps to eliminate all recruitment or placement fees charged to workers by labor recruiters and ensure employers pay any recruitment fees and related processing fees.
 6. Improve central operational coordination and data collection for anti-trafficking activities.
 7. Strengthen the capacity of the National Labor Inspectorate (NLI) to identify victims of labor trafficking and refer them to services.
 8. Ensure trafficking cases are handled by prosecutors with specialized training on trafficking crimes.
 9. Improve victims' ability to access court-ordered restitution in criminal cases and compensation through civil proceedings.
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10. Increase survivor engagement, including by including survivor input when forming policies, programs, and training, and establishing accessible mechanisms for receiving and providing compensation for such input.