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Understanding EU Funding of Anti-Trafficking Initiatives: Where is the money (not) going?

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Abstract

Critical trafficking scholars have questioned the staggering and ever-rising scale of financial investments in the anti-trafficking industry. While many analyses have focused on the United States, considerably less attention has been devoted to anti-trafficking funding provided by the European Union (EU). This paper draws on an analysis of the results of several EU programmes funding anti-trafficking actions during the 2014–2020 programming period. It describes the type of projects and organisations funded, the countries involved, the amounts awarded, and the potential reoccurrence of funding toward specific organisations. It also presents the findings of a survey of European NGOs working in the field of anti-trafficking to investigate approved and rejected projects, the reasons for rejection, and the key challenges faced in accessing EU funding. The overarching aim is to better understand funding trends against the backdrop of EU anti-trafficking policy priorities.

Keywords: European Union, anti-trafficking, funding, non-governmental organisations, technology

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Introduction

Human trafficking is often described as a 'multi-billion dollar industry',[1] 'a global business',[2] 'a fundamentally evil, but hugely profitable practice'.[3] Accordingly, financial investigations to 'follow the money trail' have become a priority for numerous governments and supra-national actors alike.[4] This has led to increased funding of organisations developing new technologies to track big money footprints and 'hunt down' criminals. In other words, the business of trafficking has spawned a parallel anti-trafficking business.[5]

Critical scholarship has not shied away from uncovering the 'dark side' of this anti-trafficking business, questioning the motives, rationales, and methods of organisations pledging to combat trafficking. Bernstein has described the strategic alliances between faith-based organisations, governments, and big technology companies embracing narrow and controversial understandings of trafficking[6] and profiting from the spectacularisation of human suffering.[7] Scholars have used terms such as 'rescue industry', 'militarized humanitarianism', and 'anti-trafficking industrial complex'[8] to describe a diverse array of individuals and

1 OHCHR, 'Human Trafficking: A Multi-Billion Dollar Global Business', 30 July 2014, retrieved 12 December 2023, https://www.ohchr.org/en/stories/2014/07/human-trafficking-multi-billion-dollar-global-business.

2 C Niethammer, 'Cracking The $150 Billion Business Of Human Trafficking', *Forbes*, 2 February 2020, https://www.forbes.com/sites/carmenniethammer/2020/02/02/cracking-the-150-billion-business-of-human-trafficking.

3 M de Cock and M Woode, *Profits and Poverty: The Economics of Forced Labour*, International Labour Organization, 2014, https://www.ilo.org/publications/major-publications/profits-and-poverty-economics-forced-labour.

4 J Mari, *Following the Money: Compendium of Resources and Step-by-Step Guide to Financial Investigations Into Trafficking in Human Beings*, Organization for Security and Co-operation in Europe (OSCE), 7 November 2019, https://www.osce.org/secretariat/438323.

5 V Tournecuillert, 'Strategically Working in Parallel to Traffickers', *Anti-Trafficking Review*, issue 3, 2014, pp. 163–166, https://doi.org/10.14197/atr.201214310.

6 G Lonergan, H Lewis, E Tomalin, and L Waite, 'Distinctive or Professionalised? Understanding the Postsecular in Faith-Based Responses to Trafficking, Forced Labour and Slavery in the UK', *Sociology*, vol. 55, issue 3, 2021, pp. 505–521, https://doi.org/10.1177/0038038520967887; M Thakor and d boyd, 'Networked Trafficking: Reflections on Technology and the Anti-Trafficking Movement', *Dialectical Anthropology*, vol. 37, issue 2, 2013, pp. 277–290, https://doi.org/10.1007/s10624-012-9286-6.

7 E Bernstein, *Brokered Subjects Sex, Trafficking, and the Politics of Freedom*, University of Chicago Press, Chicago, 2019.

8 C Cojocaru, 'My Experience is Mine to Tell: Challenging the abolitionist victimhood framework', *Anti-Trafficking Review*, issue 7, 2016, pp. 12–38, https://doi.org/10.14197/atr.20121772.

organisations that line their pockets from anti-trafficking. Far from challenging broader neoliberal mechanisms of disparity, which manufacture insecurities and fuel exploitation,[9] these actors contribute to reinforcing neo-colonial, gendered, and racialised approaches to anti-trafficking.[10] More recently, the notion of 'philantrocapitalism' has described a phenomenon that is a product both of our current economic system and of anti-trafficking itself, and embraces market-based solutions to social issues. Philantrocapitalism hinges on governments passing the buck for reform by outsourcing funds to non-governmental or private organisations.[11]

In the context of growing attention to these phenomena, some academic work has also focused on funding of anti-trafficking initiatives. Looking at OECD countries, Ucnikova investigated how much money is spent on 'modern slavery' projects and programmes annually. She found that between 2003 and 2012 the US Government was the largest donor of anti-trafficking work. Although funding going toward action to combat 'modern slavery' accounted for less than 1% of aid budget, three countries (US, Norway, and Japan) were responsible for providing over three quarters of the overall budget.[12] Other contributions to the 2014 issue of the *Anti-Trafficking Review* considered anti-trafficking spending in various national settings, such as Ukraine and the UK,[13] Nigeria,[14] and Canada.[15] However, little empirical research or assessments have been produced since, despite the volume and scale of anti-trafficking actions and funding—at both governmental and non-governmental levels—increasing exponentially.

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[9] D Peksen, S L Blanton, and R G Blanton, 'Neoliberal Policies and Human Trafficking for Labor: Free Markets, Unfree Workers?', *Political Research Quarterly*, vol. 70, issue 3, 2017, pp. 673–686, https://doi.org/10.1177/1065912917710339.

[10] K Kempadoo, 'The Modern-Day White (Wo)Man's Burden: Trends in Anti-Trafficking and Anti-Slavery Campaigns', *Journal of Human Trafficking*, vol. 1, issue 1, 2015, pp. 8–20, https://doi.org/10.1080/23322705.2015.1006120.

[11] J Chuang and E Shih (eds.), *Philantrocapitalism and Anti-Trafficking*, Beyond Trafficking and Slavery/openDemocracy, London, 2021.

[12] M Ucnikova, 'OECD and Modern Slavery: How much aid money is spent to tackle the issue?', *Anti-Trafficking Review*, issue 3, 2014, pp. 133–150, https://doi.org/10.14197/atr.20121437.

[13] K Sharapov, 'Giving Us the "Biggest Bang for the Buck" (or Not): Anti-trafficking government funding in Ukraine and the United Kingdom', *Anti-Trafficking Review*, issue 3, 2014, pp. 16–40, https://doi.org/10.14197/atr.20121432.

[14] V I Nwogu, 'Anti-Trafficking Interventions in Nigeria and the Principal-Agent Aid Model', *Anti-Trafficking Review*, issue 3, 2014, pp. 41–63, https://doi.org/10.14197/atr.20121433.

[15] A Clancey, N Khushrushahi, and J Ham, 'Do Evidence-Based Approaches Alienate Canadian Anti-Trafficking Funders?', *Anti-Trafficking Review*, issue 3, 2014, pp. 87–108, https://doi.org/10.14197/atr.20121435.

As noted by Dottridge back in 2014, limited transparency among governments, international organisations, and civil society concerning funding for anti-trafficking[16] continues to present a challenge, including in the realm of EU funding. While a host of research has turned to the USA in a bid to demystify anti-trafficking funding, only limited scholarship has focused on Europe.[17] This article contributes to shedding light on developments in EU anti-trafficking funding through an analysis of available data on projects funded during the 2014–2020 programming period and information gleaned via a questionnaire distributed among a small sample of European organisations. The aim is, firstly, to understand which projects and organisations are receiving financial support for anti-trafficking work, the populations that are being served, and the forms of trafficking which are being prioritised; and, secondly, to explore the challenges faced by NGOs in obtaining EU funding. The article sheds light on relevant funding trends, emphasises the hurdles that NGOs grapple with to run programmes and serve target populations, raises questions around the potential compromises that they might make as a result of EU funding requirements, and makes suggestions for future research.

Context

The terms 'anti-trafficking industrial complex' and 'militarized humanitarianism' describe a modus operandi common among anti-trafficking NGOs which revolves around the application of carceral feminism to the issue of trafficking.[18] This rests on a 'tough-on-crime' approach involving tight-knit collaboration with law enforcement to address a host of concerns viewed as quintessential women's rights issues, including trafficking. The solutions brought forward to counter trafficking are rooted in the increased criminalisation of certain populations—most notably sex workers—and an over-reliance on the criminal justice system.[19] The notion of NGOs building problematic alliances with governments resulting in the social control of specific individuals or groups echoes criminological analyses of the

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16 M Dottridge, 'Editorial: How is the money to combat human trafficking spent?', *Anti-Trafficking Review*, issue 3, 2014, pp. 3–14, https://doi.org/10.14197/atr.20121431.

17 For a notable exception, see S Hoff, 'Where Is the Funding for Anti-Trafficking Work? A look at donor funds, policies and practices in Europe', *Anti-Trafficking Review*, issue 3, 2014, pp. 109–132, https://doi.org/10.14197/atr.20121436.

18 A Terwiel, 'What Is Carceral Feminism?', *Political Theory*, vol. 48, issue 4, 2020, pp. 421–442, https://doi.org/10.1177/0090591719889946.

19 R Heynen and E van der Meulen, 'Anti-Trafficking Saviors: Celebrity, Slavery, and Branded Activism', *Crime, Media, Culture: An International Journal*, vol. 18, issue 2, 2022, pp. 301–323, https://doi.org/10.1177/17416590211007896.

penal voluntary sector's role in the administration of punishment.[20] Like critical trafficking scholarship, these analyses have critiqued the bourgeoning collaboration between NGOs, governments, and the private sector, and questioned its reverberations on the sector's ethos and values. Whilst acknowledging these worrisome trends, others have cautioned against viewing the NGO sector as monolithic and urged to take into account the complex dynamics of the non-profit world, which can embrace as well as resist government agendas.[21]

Much of the recent literature questioning harmful anti-trafficking practices speaks of an 'expanding' and 'rising' sector[22] responsible for perpetuating damaging practices whilst purporting to 'do good'.[23] Not unlike the penal voluntary sector, the anti-trafficking field is diverse. Some anti-trafficking NGOs in Europe embrace carceral approaches, which portray trafficking as inextricably linked to prostitution and advocate for repressive policies to punish men who purchase sex; yet, there are also organisations viewing trafficking through a labour and human rights lens and denouncing conditions of coercion and exploitation in various sectors, including, but not limited to, the sex industry.[24] These contrasting

[20] P J Tomczak and D Thompson, 'Inclusionary Control? Theorizing the Effects of Penal Voluntary Organizations' Work', *Theoretical Criminology*, vol. 23, issue 1, 2019, pp. 4–24, https://doi.org/10.1177/1362480617733724; M Corcoran, 'Dilemmas of Institutionalization in the Penal Voluntary Sector', *Critical Social Policy*, vol. 31, issue 1, 2011, pp. 30–52, https://doi.org/10.1177/0261018310385438.

[21] P J Tomczak, *Punishment and Charity: The Penal Voluntary Sector in England and Wales*, PhD Thesis, University of Manchester, 2014, https://pure.manchester.ac.uk/ws/portalfiles/portal/54554279/FULL_TEXT.PDF.

[22] J Mendel and K Sharapov, 'Expanding Circles of Failure: The Rise of Bad Anti-Trafficking, and What to Do About It', *Global Policy*, 18 November 2021, https://www.globalpolicyjournal.com/blog/18/11/2021/expanding-circles-failure-rise-bad-anti-trafficking-and-what-do-about-it.

[23] This growth is taking place against the backdrop of an expanding CSO sector. A CSO can be considered as any organisation 'whose members have objectives that are of general interest and who can act as mediators between public authorities and the public' (T Divjak and G Forbici, *The Future Evolution of Civil Society in the European Union by 2030*, European Economic and Social Committee, 2018, p.3, https://data.europa.eu/doi/10.2864/390387). This can include non-governmental organisations, religious and community-based organisations, and more. Given its hyper-diversity, it is difficult to estimate the size of the European CSO sector, but as of 2014, it engaged approximately 28.3 million full-time equivalent workers (paid and volunteer) in EU countries and Norway, accounting for 13% of the European workforce (see *ibid.*, p. 5). There are no estimations on the number of CSOs or professionals working in the CSO sector on anti-trafficking.

[24] I Ferčíková Konečná, 'Excluded but Fighting: Where Are the Voices of Sex Workers and Their Allies in EU Anti-Trafficking Policymaking?', *Social Sciences*, vol. 13, issue 3, 2024, https://doi.org/10.3390/socsci13030148.

conceptual stances are further complicated by the vast variations in the European landscape, where each national and occasionally even local context relies on a specific understanding of the nature and role of civil society. In different countries, cultural and political legacies[25] affect the degree of collaboration between NGOs and the national government, and the extent to which NGOs receive government funding. Moreover, the interpretations of trafficking that NGOs and other actors employ are often influenced by the country's politics and approach to a range of related issues, most notably, migration and security.[26]

Bearing this diversity of motives and approaches in mind is essential when examining access to EU funding. Differing approaches, understandings of trafficking, knowledge and capacity to implement projects all influence NGO financing. Over the past 20 years, EU funding has become one of the chief sources of financial support for NGOs in EU Member States and beyond.[27] Despite their role and weight, EU funding mechanisms are complex and difficult to access. EU funding rests on stringent criteria dependent first and foremost on the minute details of each funding programme and call for applications, in turn dictated by EU policies. The mandates of different agencies lead to intricacies over the type of eligible activities and the terms and conditions of funding. Projects are generally expected to be short in duration (2–3 years on average), often leaving organisations scrambling to secure new sources of funding to keep activities up and running. Time constraints stand in stark contrast with the deep-rooted, enduring needs of the people served via NGO activities.[28] It is also worth noting that competition over EU funding has increased over the years, on par with the mushrooming of NGOs across the region. Accessing funding opportunities and competing with NGOs are governments and a growing number of private sector actors, including large consultancy firms. At the same time, debates over the transparency of EU funding to NGOs have become more frequent, leading to the publication of reports such as the one by the European Court of Auditors[29] and, more recently, by the European Parliament's Policy Department for Budgetary

[25] J Casey, 'Comparing Nonprofit Sectors around the World: What Do We Know and How Do We Know It?', *Journal of Nonprofit Education and Leadership*, vol. 6, issue 3, 2016, pp. 187–223, https://doi.org/10.18666/JNEL-2016-V6-I3-7583.

[26] I Rossoni, O Büyükkalkan, and U Erken, 'An Image Is Worth a Thousand Words: Exploring Visual Imagery About Trafficking in the Online Domain – An Italian Case Study', *Journal of Human Trafficking*, 2024, pp. 1–23, https://doi.org/10.1080/23322705.2024.2335872.

[27] Hoff.

[28] M Thomas and VOICE, *NGO Perspectives on the EU's Humanitarian–Development–Peace Nexus: Exploring the Challenges and Opportunities*, VOICE, 2019.

[29] European Court of Auditors, *Transparency of EU Funds Implemented by NGOs: More Effort Needed*, No. 35, 2018.

Affairs Directorate-General for Internal Policies, calling for greater scrutiny and accountability.[30]

Anti-trafficking work, too, has been a recipient of EU funding over the years. The most comprehensive study of EU funding for anti-trafficking initiatives was carried out by scholars at Lancaster University for the European Commission.[31] It covers the period from 2004 to 2015 and comprises projects awarded to 221 principal grant holders in 62 countries, including 26 EU Member States. The Directorates-General included in the analysis are DEVCO, HOME, JUST, NEAR and RTD,[32] which are responsible for an array of different funding programmes. The final dataset comprises 321 funded projects, of which 70% were contracted before the first EU anti-trafficking strategy (2012–2016) was published.

Among the most salient findings of the report is the distribution of funding across countries, entities, and types of trafficking. The authors found that, commonly, organisations acting as lead partners were NGOs, although other principal grant holders included State agencies, international organisations, and universities and research organisations. Forty lead partners had been awarded two or more grants and five received five projects or more. Many principal grant holders (n=51 out of 221 in the sample, 23%) were also partners in other funded projects. The report emphasised that a higher proportion of EU funding was awarded to projects addressing trafficking for labour exploitation than to those addressing trafficking for sexual exploitation, notwithstanding the almost identical number of funded projects focusing on trafficking for labour and for sexual exploitation. The average funding per project on labour exploitation was double that of projects on sexual exploitation (EUR 569,308 and EUR 231,429, respectively). According to the authors, this was problematic in light of the fact that EU data at the time showed that 69% of identified victims were trafficked for sexual exploitation and 80% were women and girls.[33] However, the authors failed

[30] R Ackermann *et al.*, *Transparency and Accountability of EU Funding for NGOs Active in EU Policy Areas within EU Territory*, European Union, 2023.

[31] S Walby *et al.*, *Study on Comprehensive Policy Review of Anti-trafficking Projects Funded by the European Commission – Final Report,* European Commission, Directorate-General for Migration and Home Affairs, 2016.

[32] Directorates-General are departments of the European Commission responsible for specific policy areas, similarly to national ministries. DG DEVCO is responsible for international partnerships; DG HOME for migration and security, including human trafficking; DG JUST for justice and human rights; DG NEAR for the cooperation with the EU's neighbouring regions; and DG RTD for research and innovation.

[33] It is worth noting that statistics on trafficking should not be taken at face value, given the differences in understandings of trafficking across Europe affecting inclusion and exclusion criteria, inconsistencies in data collection practices, and more generally, the recurrent over-emphasis on sexual exploitation, reflecting enforcement priorities. See:

to mention that for years, most of the attention and funding in anti-trafficking work had been directed at trafficking for sexual exploitation, and that States and anti-trafficking actors are also obliged to tackle trafficking for labour exploitation and other neglected forms of trafficking, which were still poorly understood and addressed by anti-trafficking actors.

In the 2014–2020 programming period, the Commission allocated over EUR 35 million to anti-trafficking projects.[34] Project calls under the Asylum, Migration and Integration Fund (AMIF), a key programme funding anti-trafficking initiatives, have consistently emphasised the need to consult the above-mentioned report when developing project proposals, as well as urged to examine other relevant documents, particularly those 'addressing trafficking for sexual exploitation, as well as the high-risk groups and sectors concerned'[35] in the process of grant-writing. The need to take into account the disproportionate targeting of women and girls trafficked for the purpose of sexual exploitation has constantly been reiterated, as has been the plea for gender-appropriate approaches. AMIF calls have also required applicants to focus primarily on non-EU citizens. In a somewhat similar manner, calls under the Internal Security Fund Police (ISFP), another programme funding anti-trafficking work that aligns with AMIF in its focus on the management of external borders, have periodically cited the prevalence of sexual exploitation in the EU and emphasised the 'demand-driven nature' of human trafficking, consistently inviting projects geared towards reducing the demand for sexual services exacted from victims of trafficking.[36] In so doing, the remit of funded anti-trafficking action has been neatly carved out—in the past few years, the wording of many calls has rather overtly intimated applicants to address specifically trafficking of women and girls for sexual exploitation. The references to demand have clearly encouraged the development of projects embracing an

R Weitzer, 'New Directions in Research on Human Trafficking', *The ANNALS of the American Academy of Political and Social Science*, vol. 653, issue 1, 2014, pp. 6–24, https://doi.org/10.1177/0002716214521562.

34 European Commission, 'Questions and Answers – Trends, Challenges and Revision of the EU Anti-trafficking Directive', 19 December 2022, https://ec.europa.eu/commission/presscorner/detail/en/QANDA_22_7780.

35 European Commission, 'Address Assistance, Support and Integration of Third-Country National Victims of Trafficking in Human Beings', EU Funding and Tenders Portal, retrieved 2 September 2024, https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/topic-details/amif-2020-ag-call05?keywords=human%20 trafficking&tenders=false&forthcoming =false&openForSubmission=false&closed =true&programmePeriod=2014%20-%202020&frameworkProgramme=31077795.

36 See, for instance, European Commission, *Internal Security Fund – Police. Call for Proposals. Joint Action against Trafficking in Human Beings addressing the Culture of Impunity, ISFP-2019-AG-THB*, 26 March 2020, https://ec.europa.eu/research/participants/data/ref/other_eu_prog/home/wp/call-fiche_isfp-2019-ag-thb_en.pdf.

abolitionist perspective on prostitution.[37] Arguably, this has automatically put at a relative disadvantage organisations focusing on trafficking for labour exploitation, and even more so, organisations rejecting abolitionism, reducing their chances of accessing funding.

Methods

In order to explore funding dynamics in the 2014–2020 programming period, two main sources were employed to identify projects that fell within the remit of the analysis, namely the Project Results page on the Funding and Tenders page of the European Commission[38] and the CORDIS Results platform.[39] The reference period selected was 2014–2020 in line with programming; this choice was dictated by the fact that the 2021–2027 programming period is still ongoing and any analysis based on available results at this point would only be partial. The following programmes were included in the analysis: AMIF, ISFP, Internal Security Fund Borders and Visa (ISFB), Rights, Equality and Citizenship (REC), Justice (JUST), and Horizon 2020. These programmes were chosen because they fall under Home Affairs funding, responsible for the bulk of funding for anti-trafficking initiatives. The results of other programmes were scanned using a set of keywords (see list below) so as to pinpoint potential initiatives on the topic of trafficking, supported by other funding mechanisms. Projects funded via the EMPACT actions, provided for under the budgets of EU agencies; through the EU–UN Spotlight initiative; the EU Trust Fund for Africa; the Glo.ACT Initiative, the Development Cooperation Instrument; and the European Development Fund were also consulted but excluded from the analysis, due to the different methods utilised to categorise project data by the different programmes and the difficulties related to retrieving and systematising existing information.

The search relied on the application of filters by programming period (2014–2020) and programme, as well as the keywords ‘trafficking’, ‘human trafficking’, ‘trafficking in persons’, and ‘exploitation’. The analysis draws on the definition of trafficking included in Art. 2 of the EU Anti-Trafficking Directive and thus includes any project focusing on trafficking for ‘sexual exploitation, forced labour or services, including begging, slavery or practices similar to slavery, servitude,

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[37] I Vanwesenbeeck, ‘Sex Work Criminalization Is Barking Up the Wrong Tree’, *Archives of Sexual Behavior*, vol. 46, issue 6, 2017, pp. 1631–1640, https://doi.org/10.1007/s10508-017-1008-3.

[38] EU Funding and Tenders Portal, EU Funded Projects, n.d., https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/projects-results.

[39] See: CORDIS, n.d., https://cordis.europa.eu/search.

or the exploitation of criminal activities, or the removal of organs'.[40] Inclusion criteria comprised thematic focus on human trafficking in its contemporary relevance; receipt of funding under any of the above-mentioned programmes; and project selection and award under the 2014–2020 programming period. Projects were excluded if they did not make any reference to trafficking in the general description or synopsis; if the thematic focus was not on human trafficking (but e.g. firearms or wildlife trafficking); and if they explored slavery in a historical perspective without linkages to contemporary phenomena. It should further be noted that a conservative approach was adopted where projects on child sexual abuse or exploitation were concerned, and available information was scanned to explore whether an explicit link to child trafficking was made.

A total of 242 projects were retrieved via the above-mentioned platforms. A first reading of project summaries published online allowed to make preliminary decisions about inclusion and led to the selection of a total of 53 projects. While the number of selected projects may appear meagre compared to the original search, this derives from the fact that numerous Horizon 2020 results linked to 'trafficking' related to biology and other sciences.

Wherever possible, a more in-depth examination of additional documents concerning project activities, results, and impact was conducted. Given that such documents were generally not readily available, the preliminary selection did not undergo any further modification. Information about selected projects was categorised via an Excel spreadsheet, synthetising the key features of each project (title, total amount requested, EU contribution, type of trafficking addressed, approach to the issue of trafficking, key beneficiaries); the lead partner (organisation name, type, country, and amount awarded); and project partners (names, types, countries, and amounts awarded). To avoid skewing some key findings, the analysis of Horizon 2020 projects was conducted separately. This funding scheme is significantly larger than the others, is broadly devoted to research and innovation, and foresees the involvement of numerous partners from different sectors (profit, non-profit, academia, and public). Thus, a joint analysis would have overshadowed relevant insights related to other programmes. Finally, a follow-up analysis of the Horizon 2020 projects retrieved via the CORDIS platform, which were initially excluded because they did not fit the

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[40] European Parliament and Council of the European Union, Directive 2011/36/EU of the European Parliament and of the Council of 5 April 2011 on Preventing and Combating Trafficking in Human Beings and Protecting Its Victims, and Replacing Council Framework Decision 2002/629/JHA, 5 April 2011. It is worth noting that the Directive was revised in 2024 and the definition now includes also the exploitation of surrogacy, forced marriage, and illegal adoption. This revision has not been taken into account.

above-mentioned criteria (i.e. tagged under trafficking, but without any explicit reference to trafficking in the synopsis or description), was also conducted. This was deemed relevant given the high number of projects tagged under human trafficking that rely on technological solutions to address various forms of organised crime and cybercrime, which may include human trafficking cases.

In addition to the analysis of projects, a questionnaire was created on Qualtrics and disseminated among European and international NGOs via La Strada International, the Global Alliance Against Traffic in Women, the Italian Anti-Trafficking Helpline Numero Verde Antitratta, and the researcher's direct contacts. The aim of the questionnaire was to gather additional data, including regarding organisational approaches to and understandings of human trafficking, challenges faced by organisations in applying for EU funding, and common reasons for the rejection of project proposals. The questionnaire was anonymous.

A key limitation of the analysis is that project result platforms are not regularly updated and funded projects not always listed in full. Moreover, while the CORDIS platform provides relatively satisfactory details on outputs and impact, the Results section of the EC Funding and Tenders website does not. Projects could only be examined based on the summaries provided by the applicants, which often lacked detail and depth. The questionnaire was disseminated via the researcher's networks and thus does not fully capture the variety of NGO experiences with EU anti-trafficking funding.

Results

EU Project and Results (Funding and Tenders Platform – AMIF, ISFP, REC, JUST)

Forty-three projects were extracted from the Project Results platform. Out of these, 25 were funded under AMIF, 11 under ISFP, 2 under JUST, and 5 under REC. Most lead organisations were NGOs (see Table 1), but partnerships often involved a mix of non-profit and government actors. Seven organisations were lead partners in 2 or 3 projects. The country representation of lead partners can be seen in Table 2.

Table 1: Lead Organisations in AMIF, ISFP, REC, and JUST Projects

Type of organisation	Number of projects	Percentage of projects
NGOs	25	58%
Public	9	21%
Research institutions	3	7%
Higher or secondary education establishments	1	2%
Other	5	12%
TOTAL	**43**	**100%**

Table 2: Countries of Lead Partners

Country	Number of projects	Percentage
Italy	16	37%
Netherlands	7	16%
Greece	4	9%
Romania	4	9%
France	4	9%
Germany	3	7%
Finland	2	5%
Belgium	1	2%
Cyprus	1	2%
Ireland	1	2%
TOTAL	**43**	**100%**

The top four countries—per the total number of organisations represented in project consortia and targeted by the action—were Italy (n=59; 29%), Germany (n=23; 11%), Greece (n=18; 9%), and Spain (n=16; 8%). Only one project in the sample involved activities outside Europe in a range of African and Middle Eastern countries yet did not allocate funding to partners in these countries, as a result of call limitations. The duration of projects was generally two years.

Most projects addressed trafficking for different types of exploitation (n=16, 35%); followed by trafficking for sexual exploitation (n=13, 28%); child trafficking (n=6, 13%), of which 4 focused on child trafficking for sexual exploitation; labour and sexual exploitation (n=5, 11%); trafficking for labour exploitation only (n=2; 4%); projects at the intersections of trafficking and irregular migration

or smuggling (n=1, 2%); and other (n=3, 7%).[41] Projects were grouped under 'other' if they employed ambiguous terminology such as 'trafficking of women' or 'violence and trafficking', rendering categorisation arduous, or focused on niche areas such as 'mobile banditry and trafficking'. There was also a small number of projects that claimed to focus on trafficking broadly or in a generic manner yet included mention of additional attention to a specific type of trafficking. In such cases, they were categorised both as generic and specific and thus counted twice.

Aside from professionals, who were described as the main beneficiaries in 35% of projects (n=15), the key population catered to were women victims/survivors of trafficking (n=13 projects; 30%). Nine projects (21%) served victims of trafficking in general, although one of them mentioned specific attention to potential victims of trafficking among unaccompanied children, one underscored that 50% of beneficiaries were women, and another included a focus on 'mothers and their children'. Finally, three projects (7%) were addressed to children and young adult victims/survivors of trafficking, one targeted both children and women (2%), and two (5%) lacked direct beneficiaries. Numerous projects highlighted third-country nationals as target population, which is a reflection of AMIF calls being addressed primarily to non-EU nationals. In some instances, nationals of specific countries or regions, such as Nigeria, West Africa, or China, were targeted.

The amount of funding requested ranged from approximately EUR 132,000 to 1,200,000, with the average amount per project reaching almost EUR 427,000. The total amount awarded to the selected projects adds up to a little over EUR 18 million. An interesting finding is that a number of organisations in the sample acted as both lead partners and partners or merely as partners in multiple projects during the analysed period. In some cases, this entailed participating in up to seven projects over 3–5 years. Overall budgets for participation in multiple projects varied across organisations and ranged from approximately EUR 87,000 (an organisation partnering in two projects) to roughly EUR 625,000 (an organisation partnering in seven projects). There was a tendency for many organisations to re-partner with the same organisations, which—albeit understandable, considering the need to establish networks of trust—is likely to result in the same organisations disproportionately benefiting from EU funding. This is all the more important when one considers that several EU countries are not represented in the sample and that funding is therefore channelled into specific jurisdictions.

[41] The total is greater than 43 (total number of projects) due to projects indicating multiple types of trafficking (e.g. trafficking in general and child trafficking).

CORDIS Platform (Horizon 2020)

Trafficking-Specific Results

Ten projects on the topic of trafficking were identified via the CORDIS platform for approximately EUR 18 million. Project budgets ranged from as low as EUR 183,000 to as high as approximately EUR 5,000,000. The largest consortium involved almost 30 partners, but there were also instances where large budgets were allocated to a single organisation. Lead partners were all higher and secondary education institutions and mostly located in Spain, the UK, or Germany (two projects each per country). Organisations in Israel,[42] France, Denmark, and Belgium all led one project. Consortia often involved a wide range of countries within and outside Europe and cross-sectoral collaborations between academia, NGOs, private companies, and higher and secondary education institutions.

Project durations ranged between one and six years. Given that the Horizon 2020 programme focuses on research and innovation, projects incorporated different research elements. Scientific disciplines spanned anthropology, history, health, IT, and more, with some projects taking more theoretical and others more empirical approaches. Projects were categorised based on the specific angle taken on the issue of trafficking, which, given the analytical stance privileged by the programme, was difficult to subsume under the categories used for other programmes. This notwithstanding, the main types of trafficking addressed were child trafficking, labour trafficking and exploitation, and the intersections of human trafficking and migrant smuggling. Two projects embraced a critical stance to trafficking via a public health approach and by critiquing sexual humanitarianism. It is interesting to note that three projects were technology-focused: one rested on elaborate solutions for coastal border surveillance, increasing internal security by preventing cross-border crime such as trafficking in human beings and the smuggling of drugs; another rested on the development of semi-automated tools for risk analysis; and the third explored digital solutions to prevent child sexual abuse and trafficking.

[42] Israel, alongside other non-EU countries, participated in the Horizon 2020 programme as an associated country. See 'Horizon 2020 Country Profiles (2014–2020)', European Commission, n.d., https://research-and-innovation.ec.europa.eu/statistics/framework-programme-facts-and-figures/horizon-2020-country-profiles-2014-2020_en.

Projects Focusing on Technology for Combating Organised Crime/Cybercrime and Slavery

Although the initial screening via the pre-established inclusion criteria yielded a modest number of pertinent results, further analysis of excluded projects was conducted in order to identify relevant trends. These 25 projects, which were tagged in the system as related to trafficking—without precise information as to the specific linkages—involved the development of technological solutions to prevent and fight organised crime and cybercrime. The topics included novel technologies to understand the factors affecting online behaviour related to novel forms of cyber criminality; virtual reality or game solutions to improve law enforcement's decision-making processes in high-stress situations or in interrogations; surveillance technologies offering detection, recognition, identification, and tracking of suspicious vessels at sea; and, more generally, AI for security. The partnerships in these projects involved private companies, universities, think tanks, and public bodies, but hardly any NGOs. Budgets ranged from approximately EUR 70,000 to 17 million.

Furthermore, a number of projects that were excluded from the analysis because they focused on historical events were funded by the programme. These projects investigated slavery in its various manifestations in different countries, in some instances displaying the clear intention of clarifying the impact of historical events on current trafficking trends. However, in this realm, consortia were significantly smaller and budgets more modest, ranging between approximately EUR 160,000 and EUR 2.5 million.

Questionnaire

Twenty organisations completed the questionnaire in full. Of these, 70% (n=14) were NGOs, 15% (n=3) were private companies, and 15% (n=3) identified as 'other'. Most organisations are active at the local (n=9; 45%) or the national level only (n=5; 25%). The remainder (n=6; 30%) stated that they are active at multiple levels, including the EU and international levels. The sample includes organisations of different sizes ranging from micro (<10 employees and collaborators) to small (10–49 employees and collaborators); medium (50–99 employees and collaborators); and large (>99 employees and collaborators), as seen in Table 3.

Table 3: Summary of Organisations in the Sample by Type, Country, and Size

Type of organisation	Number	Percentage
NGOs	14	70%
Other	3	15%
Private company	3	15%
TOTAL	20	100%
Country	**Number**	**Percentage**
Italy	11	55%
Netherlands	4	20%
France	2	10%
Belgium	1	5%
Germany	1	5%
Poland	1	5%
TOTAL	20	100%
Size of organisation	**Number**	**Percentage**
Micro	5	25%
Small	7	35%
Medium	5	25%
Large	3	15%
TOTAL	20	100%

Regarding thematic focus, only four organisations (20%) work exclusively on trafficking and one (5%) works specifically on victims' rights. The remainder combine their work on trafficking with work in other areas, such as migration, sex work, LGBTQIA+ rights, or women's rights. Seventy-five percent of organisations (n=15) stated that they provide direct support to victims/survivors of trafficking. Only one stated that the support provided is only legal, with the remaining providing multi-level assistance covering legal, emotional and psychological support, medical assistance, access to accommodation, and access to education, training, and employment.

Regarding the type of trafficking organisations work on, 40% (n=8) stated that they focus on trafficking for sexual and labour exploitation; 20% (n=4) address trafficking for sexual exploitation, labour exploitation, and exploitation of criminal activities; 10% (n=2) tackle trafficking for sexual exploitation, labour exploitation, exploitation of criminal activities, and for the removal of organs; and 10% (n=2) only focus on labour exploitation. Fifteen percent (n=3) stated that they focus

on all types of exploitation, and 5% (n=1) prioritise sexual exploitation and exploitation of criminal activities.

Forty-five percent of respondent organisations (n=9) rely on EU funding to sustain their activities, yet this is never their only source of funding. In fact, most organisations tap into a range of funding options, often combining national government, local government, and private donor funding. Of the EU programmes under which organisations applied during the 2014–2020 programming period, the most commonly cited was AMIF. Three organisations mentioned additional programmes such as REC, JUST, ISFP, Erasmus+, and the European Neighbourhood and Enlargement Negotiations (DG NEAR) programme. Organisations reported submitting as few as one EU project and as many as 25 either as leads or as partners in the 2014–2020 period. Similarly, success rates varied significantly; some organisations failed to receive funding altogether, despite having applied for one or more projects (in one case up to six projects, all rejected); others enjoyed low success rates (between 1 and 25%), moderate success (26–50%), or good success (51–75%); and one organisation applied for seven projects and received funding for all. The target groups of funded projects included victims/survivors of trafficking defined in a generic manner, posted workers in care work, domestic workers, asylum seekers and refugees, foreign mothers with children, women survivors of sexual and labour exploitation, as well as various professionals (law enforcement, policymakers, and judiciary). Funded activities included research, training for professionals, awareness-raising, information-provision, shelter, and assistance. Total amounts of EU funding obtained during the period, as reported by respondents, ranged between EUR 50,000 and 1,000,000.

Organisations were also asked about the main reasons provided for project rejection. Their responses included technical weaknesses (e.g. gaps in project design, evaluation strategy, etc.), the proposal being partially or wholly not aligned with the priorities of the call or programme, partnerships being considered weak, a low number of beneficiaries, and other factors linked to insufficient programme funding (e.g. meeting the threshold for project approval, yet not receiving funding due to a high number of proposals submitted).

Finally, organisations were invited to share insights into the main challenges they face in securing EU funding for anti-trafficking initiatives. The most frequent answer was the limited grasp of the functioning of EU politics, followed by competition (too many organisations applying for funding) and limited capacity to apply for or manage EU projects. Other reasons included an understanding of trafficking which may differ from the EU-level interpretation, the need to increase staff rates to cover overheads, and being located in rural areas.

Organisations that declared not to rely on EU funding were asked to explain the reasons why they do not apply for EU funds. In most cases, these related

to the *complexity* of EU grants, understood primarily in terms of administrative requirements, and in one case, to the requirement for an extensive partnership. Other factors included lack of staff, limited presence in EU networks, and preference for national funds. One organisation mentioned having applied several times for EU funds without succeeding.

Discussion

My analysis confirms only in part some of the trends previously identified by the 2016 review of EU funding for anti-trafficking initiatives as regards the distribution of funding.[43] Specifically, in the AMIF, ISFP, REC, and JUST programmes, the main recipients of anti-trafficking funding were NGOs. Certain countries are recurrent in the sample, most likely as a result of the higher number of applications or the quality of proposals. Moreover, many organisations benefit from funding via participation in multiple projects as leads *and* partners. While Walby *et al.* also highlight this trend, they fail to point out that it may derive from the narrow focus of funding calls, which likely favour organisations that more openly or persuasively align with them. Despite Walby *et al.* lamenting the lower budgets allocated to projects focusing on sexual exploitation, as opposed to labour exploitation,[44] it is worth noting that, except for research projects identified via the CORDIS platform, only a handful of projects in my analysis addressed labour exploitation, with most initiatives focusing either on trafficking without a specific reference to distinct forms of exploitation or targeting sexual exploitation.

Moreover, project beneficiaries were overwhelmingly women, reflecting project calls priorities and, perhaps, a rather narrow understanding of the experiences of victimisation in trafficking. Although it was not possible, via the information available, to draw definitive conclusions on the approaches embraced by specific projects and organisations, the results seem to indicate that the majority of funded projects align with EU policy trends in terms of focus and target beneficiaries. The attention devoted to sexual exploitation and women survivors or women at risk of trafficking echoes the carceral approaches described earlier.

Funding in the programming period supported various alliances between NGOs and government agencies joining forces to roll out initiatives which too may buy into the priorities of carceral approaches. Horizon-funded projects were significantly more diverse in terms of themes and partnership composition, a finding which may be viewed positively. Nonetheless, the analysis of Horizon results also sheds light on the hefty amount of funding going toward private sector-led projects involving the deployment of technological solutions to combat

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43 Walby *et al.*

44 *Ibid.*, pp. 8, 50, 51.

a range of crimes, including trafficking. The exact scope of these projects, based on available information, is not always clear.

Horizon remains one of the most difficult programmes to access given its complexity and is thus almost out of bounds for many non-profits, particularly smaller ones. Relatedly, the NGO questionnaire responses highlight that there remain numerous difficulties in benefiting from EU funding, and that administrative burdens represent a major hurdle.[45] This may prevent organisations, particularly smaller grassroots and community-based ones, from applying for EU funding.

Conclusions

In recent years, a substantial amount of EU funding has gone towards supporting anti-trafficking initiatives in Europe and beyond. This article has highlighted that in line with broader EU policy trends emphasising trafficking for sexual exploitation and demand reduction, funding in the 2014–2020 programming period, particularly under programmes that specifically target trafficking such as AMIF and ISF, appears to have placed significant focus on sexual exploitation compared to other forms of exploitation. Moreover, it has privileged narrow understandings of trafficking victimisation reflected in funded projects' choice of beneficiaries. The analysis has also underscored that there are disparities in access to EU funding in the NGO sector, which can be traced back to a host of relevant factors, including, chiefly, administrative burdens.[46]

A potentially concerning development is the amount of funding going toward various 'tech solutions' developed by broad partnerships of private actors, public bodies, and academia. Many of these solutions are designed to support law enforcement agents in pursuing the EU security agenda, yet their nature, scope, and applicability in relation to trafficking deserves to be questioned and further scrutinised.

This research is limited in that not all EU funding programmes were covered, and the responses gathered via the questionnaire may have been partly influenced by dissemination via networks known to the researcher. A larger sample would have doubtlessly enriched the analysis. Nevertheless, the data indicates that the

[45] L Kapff, M Saunier, and T Van Schoubroeck, *EU Financing for NGOs in the Area of Home Affairs, Security and Migration*, European Parliament, Directorate General for Internal Policies, 2014, https://www.europarl.europa.eu/RegData/etudes/etudes/join/2014/490685/IPOL-JOIN_ET(2014)490685_EN.pdf.

[46] Z Darvas *et al.*, *EU Funds for Migration, Asylum and Integration Policies Budgetary Affairs*, European Union, 2018, https://www.europarl.europa.eu/cmsdata/147324/20180516-migration-funding-study-updated.pdf.

NGO sector is one of the players that the EU relies upon to carry forward its anti-trafficking agenda. This does not mean that all NGOs subscribe to EU policy priorities. In accordance with scholarship emphasising the vast diversity of the non-profit sector, there were NGOs in the sample[47] which relayed that the reason for not receiving EU funding relates to their approach to human trafficking. While it was not possible to investigate this claim in further detail—e.g. by exploring whether a pro-sex worker rights stance might hinder access to EU funding—growing appetite for 'end-demand' policies[48] is likely to impact the type of initiatives and, by extension, the type of organisations funded in the future. The negotiation and bargaining acts of NGOs to access EU funding in cases where money is scarce, or the resistance strategies that they rely upon (e.g. through diversification of funding) could not be captured in this paper and would require further cross-national qualitative investigation.

Undoubtedly, through their initiatives, NGOs and other organisations play an active role in defining the contours of trafficking discourse. They make decisions over those who are deemed vulnerable and those who are not and determine who is eligible for assistance, whether this is funded via EU projects or other initiatives.[49] Future research should look into the main actors who are contributing to 'vulnerability construction' in the field of trafficking by benefiting from EU funding or, indeed, other types of grants at the national and international level. Moreover, scholars should explore the diverse motivations, experiences, understandings of trafficking, and resistance mechanisms—including those connected to funding strategies—of NGO actors working in the field. Analyses of publicly available impact evaluation reports produced via projects may help in better understanding the contents of funded initiatives, the approach embraced, and the extent to which they subscribe to EU policy priorities. In addition, further scrutiny should go into projects that rely on similar or identical partnerships, and organisations that are invested in a range of EU-funded initiatives, especially those funded by the same programme.

Future research should also scrutinise projects focusing on the deployment of novel technologies to combat trafficking. While technology's potential to address social issues is often heralded, it can also act as a tool for state surveillance and

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[47] I.e. questionnaire respondents.

[48] Ferčíková-Konečná.

[49] K Glyniadaki, 'Mixed Services and Mediated Deservingness: Access to Housing for Migrants in Greece', *Social Policy and Society*, vol. 20, issue 3, 2021, pp. 464–474, https://doi.org/10.1017/S1474746421000014; N Ratzmann and N Sahraoui, 'Introduction: The (Un)Deserving Migrant? Street-Level Bordering Practices and Deservingness in Access to Social Services', *Social Policy and Society*, vol. 20, issue 3, 2021, pp. 436–439, https://doi.org/10.1017/S1474746421000129.

repression.[50] More reflection should go into understanding what technology can offer to create safety and reduce exploitation,[51] but also its potentially negative impact. Finally, EU agencies should make project data readily accessible to the public and guarantee comparability across funding programmes. Access to this information will prove invaluable to 'follow the money' and paint a more accurate picture of EU funding of anti-trafficking initiatives.

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[50] J Musto, M Thakor, and B Gerasimov, 'Editorial: Between Hope and Hype: Critical Evaluations of Technology's Role in Anti-Trafficking', *Anti-Trafficking Review*, issue 14, 2020, pp. 1–14, https://doi.org/10.14197/atr.201220141.

[51] S Milivojevic, H Moore, and M Segrave, 'Freeing the Modern Slaves, One Click at a Time: Theorising Human Trafficking, Modern Slavery, and Technology', *Anti-Trafficking Review*, issue 14, 2020, pp. 16–32, https://doi.org/10.14197/atr.201220142.