

## A Victim-Centred Approach to Tackling Organised Crime in the European Union

### Introduction

Organised crime in the European Union has evolved significantly. It is no longer characterised primarily by rigid hierarchical structures, but increasingly by flexible, network-based systems operating across borders and through digital environments. These networks are often embedded within legitimate economies and rely on complex structures that facilitate large-scale criminal activity.<sup>1</sup>

This evolution has expanded both the **scale and the nature of harm**. Organised crime is not only a security and economic threat, but also a **systemic driver of victimisation**, affecting individuals, communities and institutions. It is also closely linked to corruption, which enables criminal networks to operate, expand, and avoid detection. By infiltrating public institutions and private sector structures, organised crime can influence decision-making, obstruct justice, and weaken safeguards designed to protect individuals. This further undermines trust in *institutions* and reduces the likelihood that victims will report crimes or seek support. Despite this, policy and operational responses remain largely **offender-focused**, with insufficient attention to how organised crime generates and sustains victimisation in practice.

A defining feature of contemporary organised crime is the increasing reliance on **exploitation for criminal activities and/or for purposes of forced criminality**. Individuals are used as instruments within criminal activities through coercion, manipulation, or abuse of vulnerability. Exploitation may occur without visible force and instead relies on psychological pressure, dependency, or social dynamics, making it particularly difficult to identify.<sup>2</sup> This is especially noticeable in the case of **children and young people**. Evidence shows that children are recruited into criminal activities through the abuse of vulnerabilities such as age, trauma, or socio-economic disadvantage. Recruitment may take place through social networks, local environments, or increasingly through digital means, and often involves gradual processes of manipulation rather than overt coercion.<sup>3</sup> This indicates the increasingly complex modus operandi employed by criminal networks to target their victims. In many cases, the distinction between victim and offender becomes blurred. Individuals involved in criminal activities are frequently treated as perpetrators, despite clear indicators of exploitation. This misidentification can result in criminal records, disrupted life trajectories, and increased risks of re-victimisation.<sup>4</sup>

Across Europe, there is growing evidence of children being exploited in organised criminal activities, including drug trafficking and other forms of forced criminality. According to the UNODC 2024 Global Report on Trafficking in Persons, approximately 22 per cent of all victims identified in Western and Southern Europe are trafficked for the purpose of criminal exploitation, including drug-related offences. The number of identified victims trafficked for the purpose of criminal exploitation is increasing, with children,

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<sup>1</sup> European Parliament, *Addressing the Nature and Impact of Organised Crime on the International Scene: Understanding and Legislating for the Role of Organised Crime Groups as Geopolitical Actors* (Brussels, 2026), p. 4

<sup>2</sup> European Institute for Crime Prevention and Control (HEUNI), *Between Victimhood and Offending* (Helsinki, 2026), p. 6

<sup>3</sup> HEUNI, *Between Victimhood and Offending*, pp. 32–33 (risk factors, recruitment dynamics, role of social environments).

<sup>4</sup> HEUNI, *Between Victimhood and Offending*, p. 6.

particularly boys, disproportionately affected.<sup>5</sup> Additionally, trafficking in human beings increasingly intersects with other forms of organised crime, including cyber and financial crimes. Expanding in strength, reach, and sophistication, criminal networks have diversified their operations to exploit thousands of victims across a wide spectrum of criminal activities. Their methods are highly strategic, deliberately targeting vulnerabilities shaped by gender, age, and socio-economic marginalisation. Women, men, and children are exploited in distinct ways, while individuals from minority or socially excluded communities are disproportionately affected, as they are least protected by existing systems.

A new dimension of vulnerability has also emerged: the deliberate targeting of individuals with specific technical skills and digital competencies to be coerced into scamming operations. This cyber-enabled financial crime, where digital technologies intersect with illicit financial activity has rapidly become one of the most significant transnational threats. Beyond large-scale financial fraud and online scam schemes, victims are also forced into theft, burglary, shoplifting, smuggling of migrants, benefit fraud, violent crimes, and other organized criminal activities.

Organised crime groups rely on a range of **recruitment and control mechanisms**, including grooming, provision of money or gifts, emotional manipulation, and violence. Victims may be drawn into criminal activity in ways that create complicity, reducing the need for direct coercion and making disengagement more difficult.<sup>6</sup> These dynamics also contribute to **underreporting**, as victims may not recognise themselves as such or may fear retaliation. At the same time, groups are increasingly capable of targeting **large numbers of victims simultaneously**, operating in ways that resemble business models and enabling the exploitation of hundreds of victims at scale.<sup>7</sup> Traffickers exploit victims not only for profit but also as a buffer to shield themselves from prosecution, making this a complex and rapidly expanding form of exploitation that demands co-ordinated, victim-centred responses. Effective identification of victims of forced criminality requires more than simply recognising subtle indicators of coercion - it is first and foremost about understanding how victimhood is constructed in practice. Many victims cannot safely disclose their experiences or accept assistance due to fear, trauma, or direct control by criminals. Their guarded or resistant behaviour is frequently misinterpreted as criminal intent rather than a manifestation of exploitation. This creates a systemic risk in which those most in need of protection are instead overlooked or punished, while the true perpetrators operate with impunity behind the scenes, continuing their criminal activities and actively recruiting new victims. Strengthening identification frameworks therefore requires approaches that acknowledge these barriers, challenge narrow expectations of what an “ideal” victim looks like, and ensure that individuals coerced into criminal acts are recognised as victims and safeguarded rather than criminalised. All these, further exacerbates the invisibility of victimisation and challenges traditional law enforcement responses.

In light of these developments, the current EU framework does not sufficiently reflect the realities of modern organised crime. In particular, it does not adequately address:

- the central role of exploitation as a core modus operandi
- the systematic involvement of children and vulnerable individuals
- the blurred boundaries between victimhood and offending
- the scale and hidden nature of victimisation

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<sup>5</sup> HEUNI, *Between Victimhood and Offending*, p. 16 (increase in trafficking for forced criminality affecting children).

<sup>6</sup> Home Office, *The Impact of Organised Crime in Local Communities* (London, 2016), p. 60 (grooming, coercion, complicity and control mechanisms)

<sup>7</sup> Home Office, *The Impact of Organised Crime in Local Communities* (London, 2016), p. 45

- the systemic gaps that have enabled the rapid expansion of forced criminality trends and the understanding of this complex crime

### Concerns regarding the current framework

The current EU legal framework on organised crime, primarily based on Council Framework Decision 2008/841/JHA, has contributed to approximating Member States' approaches to tackling criminal organisations. However, it does not sufficiently reflect how organised crime operates today or how it affects victims in practice. It has evolved into a more **flexible, adaptive and transnational phenomenon**, operating through decentralised networks, legal business structures, and digital environments. These developments challenge traditional approaches focused on clearly defined criminal organisations and make it more difficult to identify both responsibility and impact.<sup>8</sup>

At the same time, the harm caused by organised crime extends beyond individual offences and often affects **communities, economic systems and social stability**, while remaining only partially visible.<sup>9</sup> The current framework does not sufficiently capture this broader and more complex nature of harm, nor does it adequately translate it into mechanisms that recognise and address the impact on victims. In practice, victimisation linked to organised crime often remains **hidden, large-scale and difficult to detect**. Many victims are not identified or recognised within existing systems, while others remain outside formal responses due to fear, dependency, or lack of awareness.<sup>10</sup>

The framework also provides limited guidance on how to address situations where individuals are involved in criminal activities but may also be affected by **vulnerability, coercion or external pressure**. This contributes to inconsistent responses across Member States and increases the risk that individuals are not recognised as victims or do not receive appropriate protection.<sup>11</sup>

Furthermore, the increasing use of **digital tools, cross-border operations and embedded economic activities** is not sufficiently reflected in the current framework. This limits its ability to respond effectively to evolving forms of organised crime and to the ways in which individuals are targeted and affected. Also, there is no sufficient reflection of the link between organised crime and corruption. Corruption enables criminal activities to persist by facilitating access to markets, protecting operations, and obstructing investigations, while also creating barriers for victims in accessing justice and support.

In 2016, the participants at the OSCE's 16th Alliance against Trafficking in Persons conference<sup>12</sup> also issued a clear call for action with specific recommendations to tackle human trafficking for the purpose of criminal exploitation, including, inter alia, proactive victim identification, especially among migrants and unaccompanied minors, stronger cross-border co-operation, specialised training for law enforcement and

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<sup>8</sup> European Parliament, *Addressing the Nature and Impact of Organised Crime on the International Scene: Understanding and Legislating for the Role of Organised Crime Groups as Geopolitical Actors* (Brussels, 2026), pp. 16–17, 43.

<sup>9</sup> European Parliament, *Addressing the Nature and Impact of Organised Crime on the International Scene* (2026), p. 4.

<sup>10</sup> Home Office, *The Impact of Organised Crime in Local Communities* (London, 2016), p. 45.

<sup>11</sup> (HEUNI), *Between Victimhood and Offending* (Helsinki, 2026), pp. 6–8

<sup>12</sup> <https://www.osce.org/secretariat/238656>

judiciary, improved data collection, and legal reforms that explicitly recognize forced criminality as a form of trafficking.

Increasingly restrictive migration and security policies risk entangling trafficking cases with immigration control, with significant consequences for both human security and public safety. When trafficking cases are primarily approached through a migration-control angle, victim protection is typically undermined, a culture of disbelief takes hold, and migrants' vulnerability to exploitation increases. This also weakens the ability of States to disrupt organized crime and enhance community safety, while precious resources are spent to punish the victims rather than the real criminals who enjoy impunity.

Overall, while the existing framework remains relevant in addressing participation in criminal organisations, it does not sufficiently capture how organised crime produces harm in practice. This reduces its effectiveness in addressing the full impact of organised crime on victims.

### The scale and nature of the threat from organised crime

Organised crime represents a **significant and evolving threat**, not only in terms of criminal markets and profits, but in the scale and diversity of harm caused to individuals and communities. Its impact is often **diffuse, cumulative and difficult to quantify**, affecting victims directly and indirectly across multiple areas of life.

One of the defining features of organised crime is its capacity to generate **large-scale victimisation**. Criminal activities are often structured in ways that allow multiple victims to be targeted simultaneously or repeatedly, including through exploitation, fraud, and other forms of organised harm. At the same time, a substantial proportion of victims remain **unidentified**, as many cases do not come to the attention of authorities.<sup>13</sup> The hidden nature of organised crime is closely linked to the **conditions in which victimisation occurs**. Victims may be dependent on offenders, embedded in the same social or economic environments, or unable to report due to fear, coercion, or lack of awareness. This results in persistent underreporting and limits the visibility of the full scale of harm.<sup>14</sup>

Organised crime also increasingly operates through **legitimate economic structures and social environments**, allowing criminal activities to be embedded within everyday life. This includes the use of businesses, local networks, and community settings to facilitate and conceal criminal activity. As a result, the boundary between legal and illegal activities becomes blurred, making both detection and victim identification more complex.<sup>15</sup>

In parallel, the groups have adapted to technological developments, making increasing use of **digital tools and online environments**. These enable new forms of recruitment, communication, control, and exploitation, while also expanding the geographical reach and speed of criminal operations. Digital environments facilitate access to a wider pool of potential victims and contribute to the scalability of harm.<sup>16</sup> Criminal networks exploit encrypted platforms, cryptocurrencies and the dark web to operate

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<sup>13</sup> Home Office, *The Impact of Organised Crime in Local Communities* (London, 2016), p. 45

<sup>14</sup> (HEUNI), *Between Victimhood and Offending* (Helsinki, 2026), p. 8

<sup>15</sup> Savona, E.U. and Riccardi, M. (eds.), *Mapping the Risk of Serious and Organised Crime Infiltration in Europe (MORE Project)* (European Commission, 2018), pp. 11–15

<sup>16</sup> European Parliament, *Addressing the Nature and Impact of Organised Crime on the International Scene* (Brussels, 2026), pp. 16–17, 43 (digitalisation, adaptability, and transnational nature of organised crime).

anonymously, targeting a wide range of victims. With the rise of AI, cybercrime amplifies traditional crimes, broadening their impact and reach.

A particularly concerning aspect of this evolution is the increasing involvement of **children and young people**. Evidence indicates that minors are systematically targeted and drawn into criminal activities across different sectors, including drug-related offences, financial crime, and other organised activities.<sup>17</sup> Their involvement is often shaped by vulnerability, social context, and exposure to criminal environments, rather than informed or voluntary participation. In many cases, recruitment takes place through **relational and social dynamics**, including peer influence, grooming, and gradual processes of manipulation. Victims may be offered incentives, emotional support, or a sense of belonging before being subjected to control or coercion.<sup>18</sup> These mechanisms make it more difficult to identify exploitation and increase the likelihood that victims remain within criminal structures over time.

The impact of organised crime therefore extends beyond immediate criminal acts, contributing to **long-term harm**, including psychological consequences, social exclusion, and reduced life opportunities. It also affects communities more broadly, reinforcing cycles of vulnerability and increasing exposure to further crime. The scale of the threat cannot be understood solely through recorded crime or enforcement data. A significant part of the harm caused by organised crime remains **hidden, normalised, or unrecognised**, particularly in cases involving exploitation and the involvement of children and young people. This requires a broader understanding of organised crime as a phenomenon that systematically produces and sustains victimisation across different contexts.

### Ways of controlling the threat: towards a new EU Directive on organised crime

The development of a new EU Directive on organised crime provides an opportunity to ensure that the EU response reflects the **current nature of organised crime and its impact on victims**. While existing instruments have focused primarily on defining offences and strengthening enforcement, a more effective approach requires a broader framework that integrates prevention, victim protection, and the realities of how organised crime operates in practice.

The impact of organised crime goes far beyond the economy and becomes a threat to democratic governance, as criminals undermine the legitimacy of the state: inequality deepens, and trust in institutions erodes due to corruption and instability, fuelling social fragmentation. As criminal networks become more powerful, violence heightens and victimisation exacerbates.

A central element of such a framework should be the **recognition of victimisation within organised crime contexts**. Evidence shows that many individuals affected by organised crime remain unidentified due to the hidden nature of exploitation, dependency on offenders, or the environments in which these crimes occur.<sup>19</sup> A new Directive should therefore strengthen obligations related to the **early identification of victims**, including in situations where victimisation is not immediately visible or where individuals are involved in criminal activities.

Closely linked to this is the need to address situations in which individuals are both involved in and affected by organised crime. In practice, responses across Member States remain inconsistent, particularly where

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<sup>17</sup> European Institute for Crime Prevention and Control (HEUNI), *Between Victimhood and Offending* (2026), p. 16

<sup>18</sup> Home Office, *The Impact of Organised Crime in Local Communities* (London, 2016), p. 60

<sup>19</sup> HEUNI, *Between Victimhood and Offending*, pp. 8

involvement may be linked to coercion, vulnerability, or social pressure.<sup>20</sup> The new Directive should provide clearer guidance to ensure that such individuals are appropriately assessed and, where relevant, recognised and treated as victims, including through the effective application of safeguards such as the principle of non-punishment.

The Directive should also better reflect the **mechanisms through which organised crime operates**, including recruitment, control, and exploitation within social and relational environments. As mentioned earlier, these processes often rely on grooming, manipulation, and the creation of dependency, rather than overt force. Addressing these dynamics requires a more integrated approach, including cooperation between law enforcement, social services, education systems, and victim support organisations.

In addition, the increasing use of **digital tools and online environments** in organised crime requires specific attention. Digital technologies facilitate recruitment, communication, and control, while also expanding the reach and scalability of criminal activities. The new Directive should ensure that legal and operational tools are adapted to these developments and support effective responses across borders.

A further priority is to ensure that the Directive reflects the **wider societal impact of organised crime**, including its links to corruption and its ability to undermine institutions and governance structures. These dynamics not only enable criminal activities to persist, but also create barriers for victims in accessing justice and support. Addressing organised crime therefore requires measures that also strengthen transparency, accountability, and institutional integrity.

Ultimately, a new EU Directive should move beyond a purely enforcement-driven approach and ensure that the response to organised crime is **comprehensive and victim-centred**. This includes recognising the full scale of victimisation, improving identification and protection, and ensuring that victims are not overlooked within criminal justice processes. Without this shift, efforts to combat organised crime will remain incomplete, leaving a significant part of its impact insufficiently addressed

### **Implementation of existing EU instruments and victim support frameworks**

While the development of a new EU Directive on organised crime is important, its effectiveness will depend to a large extent on the **proper implementation of existing EU instruments**, particularly those addressing victims' rights and exploitation.

Current EU legislation already provides a strong foundation for addressing the needs of victims affected by organised crime, notably through the revised Victim's Rights and Anti-Trafficking Directives. However, evidence consistently shows that implementation across Member States remains **uneven and, in some cases, insufficient**, particularly in complex or less visible forms of victimisation.

A key challenge relates to the **identification of victims**, especially in situations involving exploitation, coercion, or involvement in criminal activities. Many individuals affected by organised crime do not come into contact with support systems or are not recognised as victims when they do. This is particularly relevant in cases where victimisation is not immediately apparent or where individuals are perceived primarily through a criminal justice lens. In this context, the effective implementation of existing instruments requires a stronger focus on **early identification and proactive outreach**, ensuring that victims

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<sup>20</sup> HEUNI, *Between Victimhood and Offending*, pp. 6–8.

are recognised regardless of how or where they come into contact with authorities. This includes situations where individuals may initially appear as offenders but may in fact be victims of exploitation.

Closely linked to this is the need to ensure full application of **victims' rights in practice**, including the right to information, support, protection, and access to justice. In many cases, these rights are not consistently guaranteed, particularly for victims of organised crime whose situations may fall outside standard categories or involve multiple forms of harm.

The implementation of the Anti-Trafficking Directive is particularly relevant in this regard and especially the article 8 and the non-punishment principle. Trafficking for the purpose of **forced criminality** is an increasingly recognised phenomenon, yet it remains inconsistently identified and addressed in practice. Strengthening the implementation of this Directive is essential to ensure that victims of exploitation within organised crime are properly identified, protected, and supported.

In addition, there is a need to strengthen the **integration of victim support services** within broader responses to organised crime. Victim support remains unevenly developed across Member States, and access to services is often fragmented. Ensuring the availability of **generic, accessible, and high-quality support services for all victims of crime**, including those affected by organised crime, is a key component of an effective response.

This includes services that are:

- accessible regardless of reporting status
- adapted to different types of victimisation
- capable of addressing long-term needs

Furthermore, effective implementation requires stronger **coordination between different actors**, including law enforcement, judicial authorities, social services, and victim support organisations. Organised crime cases often involve complex situations that cannot be addressed through isolated interventions. A more integrated approach is therefore necessary to ensure continuity of support and avoid gaps in protection.

## Conclusion and key recommendations

A strengthened EU response to organised crime must be grounded in implementation, victim protection, and coordinated action across sectors. The following priorities should guide the development of the new Directive and broader EU action:

- Tackling organised crime must go beyond law enforcement and adopt a coordinated, whole-of-society approach, recognising organised crime as both a security threat and a driver of victimisation.
- The EU must urgently close the existing gap between security responses and victim protection, ensuring that victims of organised crime are systematically identified, recognised, and supported in practice.
- Robust and coherent strategies must be developed that combine targeted prevention, early and accurate victim identification, strong protection measures, and effective criminal justice outcomes.
- Early and proactive identification of victims must be ensured across all contexts, including in situations of hidden exploitation and where individuals come into contact with authorities as suspected offenders.

- Victims must be provided with timely, accessible, and high-quality protection and assistance, regardless of reporting status or cooperation with criminal proceedings.
- Criminal justice responses must be strengthened through the correct and consistent application of safeguards, including the non-punishment principle, ensuring that victims of exploitation are not treated as offenders.
- At the same time, efforts must be reinforced to ensure that perpetrators of organised crime are effectively investigated, prosecuted, and held accountable.
- Targeted prevention measures must address structural vulnerabilities, disrupt recruitment and exploitation mechanisms, and reduce exposure to organised crime, particularly among children and young people.
- Strong partnerships must be established and maintained among governments, civil society organisations, academia, and the private sector to ensure coordinated and effective responses.
- Victim support must be integrated into all responses to organised crime, ensuring access to generic, accessible, and high-quality services capable of addressing both immediate and long-term needs.
- Coordination mechanisms must be strengthened across law enforcement, judicial authorities, social services, and victim support organisations to ensure continuity of protection and avoid gaps in support.
- Efforts to combat organised crime must also address its links to corruption, ensuring transparency, accountability, and integrity within institutions.
- Policies and responses must contribute to building safe, inclusive, and law-abiding societies, where vulnerabilities are reduced and exploitation is prevented.

Organised crime is not only a security challenge, but a source of widespread and often hidden harm. Its impact extends beyond individual offences, shaping the conditions in which victimisation occurs and persists. The development of a new EU Directive offers an opportunity to ensure that the EU response reflects these realities. At the same time, improving the implementation of existing instruments remains essential to ensure that victims are effectively identified, protected, and supported in practice. A credible response must therefore combine effective enforcement with a consistent and victim-centred approach. Recognising and addressing the full impact of organised crime on victims is not only a matter of rights, but a necessary element of an effective and sustainable EU response.

Ultimately, improving the implementation of existing EU instruments is essential to ensure that victims of organised crime are not left behind. Without effective application in practice, even the most advanced legal frameworks will fail to address the realities of victimisation.