

# Lithuania: Regulation of labour market intermediaries and the role of social partners in preventing trafficking in human beings for labour exploitation

Disclaimer: This report has not been subject to Eurofound's usual editorial and publication process.

## 1. National definitions

Please provide, where they exist, definitions of the following key terms:

- Labour market intermediary (LMI)

In Lithuania, the term "labour market intermediary" is defined in compliance with ILO Private Employment Agencies Convention [No. 181](#), (1997), which was transposed by Law [No. IX-2016](#) of the Republic of Lithuania of 12 February 2004 on the Ratification of the Private Employment Agencies Convention. According to the Private Employment Agencies Convention, the term private employment agency means any natural or legal person, independent of the public authorities, which provides one or more of the following labour market services:

- a. services for matching offers of and applications for employment, without the private employment agency becoming a party to the employment relationships which may arise therefrom
- b. services consisting of employing workers with a view to making them available to a third party, who may be a natural or legal person (referred to below as a "user enterprise") which assigns their tasks and supervises the execution of these tasks
- c. other services relating to jobseeking, determined by the competent authority after consulting the most representative employers and workers organizations, such as the provision of information, that do not set out to match specific offers of and applications for employment

To a certain extent, labour market intermediaries are also defined in the Labour Code of the Republic of Lithuania ([LC](#)) (Article 88). According to the LC, in Lithuania employment intermediation services shall be provided to jobseekers by:

1. the Lithuanian Labour Exchange ([LDB](#)) under the Ministry of Social Security and Labour ([SADM](#))
2. a legal person established in the Republic of Lithuania or its branches whose founding documents specify the purpose of their activity being the provision of employment intermediation services
3. a legal person or another organisation established in a Member State, or its branches established in the Republic of Lithuania or another Member State which have been granted such a right in accordance with legal acts of that Member State

4. a citizen of the Republic of Lithuania or another Member State, or another natural person exercising his rights to movement in Member States granted by legal acts of the European Union and engaging in these activities.

- Temporary Work Agency (TWA)

In compliance with Law [No. XI-1379](#) on Temporary Agency Work approved in the Republic of Lithuania on 19 May 2011, a temporary work agency means any natural or legal person, or other structural organisation meeting the requirements for an employer, who concludes contracts of temporary employment with temporary agency workers in order to assign them to user undertakings to work there temporarily under their supervision and direction.

- Employment Placement Agency (EPA)

See section “Labour market intermediary”.

- Other forms of LMI

Other forms of LMI are not specified in Lithuania.

- Trafficking for labour exploitation

The term “trafficking for labour exploitation” is not separately defined in Lithuanian legislation. Usually, the broader term “trafficking” is used. In Lithuania, the term “trafficking” is defined in compliance with the [Protocol](#) to Prevent, Suppress and Punish **Trafficking in Persons**, Especially Women and Children, supplementing the UN Convention against Transnational Organized Crime which was ratified on 22 April 2003. According to the aforementioned Protocol, “trafficking in persons” means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

- Forced labour

In Lithuania, forced labour is defined in compliance with ILO Convention [No. 29](#) concerning Forced or Compulsory Labour, effective in Lithuania from 26 September 1995. The Convention defines the term “forced or compulsory labour” as all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. It should be noted that Article 48 of the [Constitution](#) of the Republic of Lithuania also stipulates that forced labour shall be prohibited in Lithuania.

## 2. Statistics

Please provide data for the last three available years for the following:

	Trafficking cases (if possible disaggregated by sex) for the purposes of labour 2.2 exploitation and domestic servitude	Other forms of labour exploitation not specifically identified as trafficking
2013	47	
2012	44	
2011	42	

Based on the data provided in 2011-2013 annual [reports](#) of the Prosecutor's General Office ([GP](#)) and the Police Department at the Ministry of the Interior. The number of pre-trial investigations includes all types of human trafficking. It is noteworthy that according to the reports, the majority of human trafficking crimes investigated over the period at issue were related to young women trafficking for sexual exploitation or prostitution in foreign countries.

On the other hand, according to expert interviews carried out during a study on Exploitation of migrant workers in Finland, Sweden, Estonia and Lithuania: Uncovering the links between recruitment, irregular employment practices and labour trafficking[1], official statistics does not reflect the real situation. Although the scope of the problem is much greater, it is not "seen" in official statistics due to several reasons. First of all, these relate to victims who often do not apply for help, do not consider themselves to be victims, do not know where to complain, and do not believe that they can be helped, etc. Secondly, the police, prosecutors, judges, or the staff of consulates may have insufficient competence in this area. The problem of trafficking for forced labour is not well understood, and some victims remain unidentified and without assistance.

[1] <http://www.cbss.org/wp-content/uploads/2012/11/HEUNI-report-75-15102013.pdf>

## 3. Legislation

Please provide details of the following legal provisions:

3.1 Registration or licensing systems for LMIs. Please give separate details for TWAs, EPAs and other LMIs where they exist. What conditions must be met? Are there regulations on liability for wages and social security?

There are no special registration or licensing systems for LMIs in Lithuania. However, to start employment activities persons are required to give a notice to LDB about their status and submit regular reports on employment services provided by them. This provision is laid down in the Procedure for Information on Providing Labour Market Intermediation Services approved by Order

[No. V-1](#) of the director of the LDB on 6 January 2010. Reports on the activities of LMIs in Lithuania are published by the LDB on a quarterly basis. It should be noted, however, that information provided by labour market intermediaries may be inaccurate as the LDB is not authorised to control activities of LMIs. According to the Lithuanian National Consumer Federation ([LNVF](#)), there are no guarantees that information provided by LMIs is correct, particularly as regards services to persons, because there are no powers granted to any authority to carry out verifications of the correctness of such information ([LNFV, 2010](#)).

As it was mentioned above, specific features of TWAs are regulated by the Law of the Republic of Lithuania on Temporary Agency Work. Although the Law does not provide for a special registration system for the aforementioned entities, the Law stipulates that a temporary work agency is obliged to notify the administration agency of the State Social Insurance Fund about commencement of work by a temporary agency worker (at least 1 hour before the commencement of work). The Law further stipulates that with a view to implement the duty of the employer to provide a safe and healthy working environment, a temporary work agency must satisfy itself that temporary workers to be placed will work in the working environment which meets the requirements laid down in occupational health and safety legislation. The temporary work agency must ensure that relevant employment procedures are applied when placing foreign national and stateless persons to temporary work in accordance with applicable regulatory acts.

In addition, in December 2011 the Procedure for providing information about commenced temporary agency work activities and the number of temporary agency workers for the State Labour Inspectorate ([VDD](#)[\[1\]](#)) was approved in Lithuania. The Procedure stipulates that TWAs shall provide the VDI with information on the commenced employment activities through temporary work agencies, the number of temporary workers placed and termination of the activities.

[\[1\] http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc\\_l?p\\_id=413456&p\\_query=&p\\_tr2=2](http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=413456&p_query=&p_tr2=2)

3.2 Are there any special provisions for cross border recruitment or posting? If so please identify them.

In the context of implementing Directive 2006/123/EC of the European Parliament and of the Council of 12 December 2006 on services in the internal market, on 21 December 2009 Law [No. XI-589](#) was adopted in the Republic of Lithuania amending Articles 87, 88, repealing Article 90 of the Labour Code, and amending the annex to the Code whereby licensing of cross-border labour market intermediation was withdrawn. Since 5 January 2010 cross-border LMIs in Lithuania have been put on the same footing with other service providers and the SADM stopped issuing licences for engaging in this type of activities. Like other LMIs, cross-border employment agencies are required to provide notices to the LDB about their status and regularly report on employment services provided to persons.

Law on Guarantees for posted workers was adopted in Lithuania in 2005[\[1\]](#). The Law implements Directive 96/71/EC of the European Parliament and of the Council of 16 December 1996 concerning the posting of workers in the framework of the provision of services.

[\[1\] http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc\\_l?p\\_id=268352](http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=268352)

3.3 Are there any special legislation or rules, regulations or procedures specifically aimed at preventing trafficking in human beings activities which apply to LMIs?

In Lithuania there are no special legislation or rules, regulations or procedures specifically aimed at preventing trafficking in human beings activities which apply to LMIs.

3.4 Are there any other forms of relevant regulation (including non-binding, voluntary or self-regulation) within the LMI sector? Please give details.

In Lithuania there are no other forms of relevant regulation within the LMI sector.

3.5 What specific legal measures exist for combatting trafficking, forced labour, or labour exploitation? How are cases detected and measures enforced?

There have been 3 programmes for the prevention and control of trafficking in human beings implemented in Lithuania since 2002:

- Programme for the Prevention and Control of Trafficking in Human Beings for 2002–2004<sup>[1]</sup>;
- Programme for the Prevention and Control of Trafficking in Human Beings for 2005–2008<sup>[2]</sup>;
- Programme for the Prevention and Control of Trafficking in Human Beings for 2009–2012<sup>[3]</sup>.

In addition, the Interdepartmental Action Plan of the National Programme for Crime Prevention and Control for 2013-2015 was approved by LRV Resolution [No. 1381](#) of 14 November 2012. One of the priority trends in the Plan is to strengthen the fight against human trafficking. Measures under this priority are implemented by the Ministry of the Interior ([VRM](#)), the Police Department at the VRM, the SADM, the Ministry of Foreign Affairs ([URM](#)) and the LDB. The main trends in strengthening the fight against trafficking in human beings in Lithuania include human trafficking crime prevention; improvement of skills in this area; provision of complex assistance to and protection of rights of victims of human trafficking and forced prostitution; ensuring effective cross-border cooperation in combating trafficking in human beings.

Some of the measures under the aforementioned programmes were targeted at forced labour. For instance, the programme for 2009–2012 provided for getting familiar with and using EU's criminal prosecution experiences in fighting against human trafficking for forced labour and labour exploitation. However, it should be noted that the majority of measures regulated in Lithuanian legislation are focused on the prevention of other forms of human trafficking (usually, on forced prostitution) rather than on forced or compulsory labour, as well as on assistance to victims of trafficking in human beings.

In Lithuania, criminal liability for trafficking in human beings is regulated by the Criminal Code of the Republic of Lithuania ([BK](#)). Articles 147 and 157 of the BK prohibit any form of human trafficking and impose penalty for this crime varying from a fine to imprisonment for a term of up to 12 years. In order to properly implement the provisions of the Convention of the Council of Europe on action against trafficking in human beings and to enhance the effectiveness of the fight against trafficking in human beings amendments to the Criminal Code were adopted on 30 June 2012. The [amendments](#) clarified the provisions concerning human trafficking, exploitation for forced labour or services, and trafficking in children. These amendments also entrenched criminal liability for the users of forced labour or services.

Lithuania still does not have a coherent system that could help identify cases of trafficking in human beings. The VRM has developed and transmitted to all responsible institutions and organisations the [criteria](#) for the identification of trafficking victims and a person transfer form for being adapted in relevant internal regulations of various institutions or organisations in Lithuania. These forms have been adapted by the LDB, the VDI, and some municipalities. It is also noteworthy that in 2014 an interdepartmental working group was set up by the GP, composed of LRV representatives and NGOs, for developing standard criteria to combat trafficking and also criteria for the identification of trafficking victims. However, according to the [research](#), there is no agreement on victims' identification criteria between the NGOs and Lithuanian government despite government's efforts to establish, and, allegedly, impose its narrowly define standards on NGOs.

In addition, the VRM has published on its [website](#) an email address for sending information about likely cases of human trafficking and seeking advice.

[1] adopted by the Order [No 62](#) of the Government of the Republic of Lithuania ([LRV](#)) (17 01 2002)

[2] adopted by the Order [No 558](#) of the LRV (19 05 2005)

[3] adopted by the Order [No 1104](#) of the LRV (09 09 2009)

## 4. Social partner actions

**Please give details of any actions undertaken by social partners to combat trafficking for labour exploitation in LMIs:**

### 4.1 Collective Agreements

There are no agreements tackling trafficking for labour exploitation in LMIs in Lithuania.

### 4.2 Codes of practice or practices specifically aimed at preventing trafficking for labour exploitation.

There are no codes of practice or practices specifically aimed at preventing trafficking for labour exploitation.

### 4.3 Other social partner activities

In order to protect people departing from Lithuania to work abroad, Lithuanian trade unions place on their websites links to certain guidelines valid in the host countries. For example, the website of the Lithuanian Trade Union Confederation ([LPSK](#)) provides information on work and employment conditions in the UK.

Lithuanian Trade Union 'Solidarumas' ([LPS Solidarumas](#)) together with State Labour Inspectorate ([VDI](#)), employers organisations and partners from Latvia and Estonia participates in European Commission funded project 'Posting of workers: enhancing administrative cooperation and access to information in Baltic region'. The main aim of the project – to ensure appropriate cooperation among administrative and social partners as well as among three Baltic States in changing information and consultations. The main concern of Lithuanian social partners (particularly – trade unions) – to ensure appropriate level of remuneration for Lithuanian employees posted in other countries. Recently social partners organised/participated in several seminars, round-table discussions aimed at clarification of

the requirements set forth in the Directive 96/71/EC as well as to get more knowledge on the actual situation in the area of posting workers.

## 5. NGOs

**Please identify any NGOs having a specific role in combatting trafficking for labour exploitation, or supporting workers affected:**

In Lithuania, non-governmental organisations actively cooperate with public institutions and governmental organisations in the launching and performance of pre-trial investigations concerning human trafficking. They provide support to trafficking victims, share their experience in trainings and disseminate information to the general public. Support for victims and potential victims of trafficking in human beings is provided by the following Lithuanian NGOs: [Lietuvos Caritas](#), Missing Persons' Families Support Centre ([DŽŠPC](#)), Klaipeda Social and Psychological Services Center ([KSPPC](#)), Association “Men’s Crisis Centre” ([VKC](#)), Women's Issues Information Centre ([MIC](#)), Association of HIV/AIDS Affected Women and Their Families ([ŽIV/AIDS paveiktų moterų bei jų artimųjų asociacija](#)), International Organisation for Migration ([TMO](#)), and others.

Lietuvos Caritas is particularly active in the aforementioned activities. This organisation provides [assistance](#) to persons who have been exposed to sexual abuse and/or various forms of human trafficking in Lithuania or abroad: prostitution, forced labour, exploitation for criminal offences, fictitious marriages, begging. The services provided include crisis assistance, psychosocial rehabilitation (safe shelter, financial support, consultations of social workers, psychotherapists, physicians, lawyers, acquisition of professional skills), and post-programme support. Since 2013 Lietuvos Caritas has been participating in three translational anti-trafficking projects: European Communities Against Trafficking ([ECAT](#)) (2013-2014), Lithuanian Society Against Trafficking: the [Model of Systematic Approach](#) (2013 - 2015), and the [Model of Systematic Approach to the Prevention of Trafficking: Interdepartmental Cooperation](#) (2013 - 2015).

DŽŠPC carries preventive and educational activities (public lectures, conferences, seminars; commemorative days celebration; publicity through the mass media, posters and leaflets and dissemination; publicity of [Internet](#) threats); provides assistance to victims and those potentially liable to become victims (self-help groups organisation, therapy, lectures in schools, capacity building programmes for vulnerable groups); provides shelter for victims, runs integration programmes, Food Bank program<sup>[1]</sup>.

Activities of VKC – assistance for victims of human trafficking; counselling by social worker, lawyer and psychologist; in 2012, a project Complex Assistance to Help Victims of Trafficking-Preventive Education of Men and Young Men in Kaunas and Kaunas District: Complex Support for Men Victims of Human Trafficking as well as Preventive Programme for Young Men (aged 14–18) were carried out <sup>[2]</sup>.

Activities of the MIC – the information website [www.lygus.lt](http://www.lygus.lt) for women has been developed which, in addition to other information, provides information about human trafficking and circulates information on where victims could seek assistance. One of the main activities of the MIC is

prevention in trafficking of women as well as creation and dissemination of social advertisement, publication of Training Guide for Working with Victims of Forced Labour (2011). Implemented project We Are Society Too: preventive billboards released, a conference organised, training conducted for women from social risk groups, Internet campaign against human trafficking and youth debates conducted [3].

[1] <http://www.cbss.org/wp-content/uploads/2012/11/HEUNI-report-75-15102013.pdf>

[2] ibid

[3] ibid

## 6. Good practice

**Please give examples of good practice in the combat of trafficking for labour exploitation in LMIs:**

On 30 June 2014, the VRM, the European Institute for Crime Prevention and Control, affiliated with the United Nations ([HEUNI](#)), the Council of the Baltic Sea States Task Force against Trafficking in Human Beings ([TF-THB](#)) and the University of Tartu ([UT](#)) finished a two-year flagship project “ADSTRINGO: addressing trafficking in human beings for labour exploitation through improved partnerships, enhanced diagnostics and intensified organisational approaches” in 9 countries of the Baltic Sea region – Finland, Norway, Sweden, Denmark, Island, Germany, Estonia, Latvia and Lithuania. The project was financed under the European Commission Programme for the Prevention of and Fight against Crime and by TF-THB, VRM and HEUNI funds. The Project covered implementation of a series of activities, including elaboration of the Guidelines to prevent abusive recruitment, exploitative employment and trafficking of migrant workers in the Baltic Sea region.

The aim of the [project](#) was to prevent trafficking for purposes of forced labour through enhanced national and regional partnerships and through improved understanding of the mechanisms that facilitate exploitation of migrant labour within the Baltic Sea region. During the project two national meetings in each participating country were organised in order to establish a dialogue among key labour actors, as well as a focused research on recruitment practices and roles of recruitment agencies and employers in the exploitation of migrant labour was carried out in Finland, Sweden, Estonia and Lithuania. Furthermore, [Guidelines](#) to prevent abusive recruitment, exploitative employment and trafficking of migrant workers in the Baltic Sea Region were developed.

## 7. Research

**Please identify any significant studies published since 2010 relating to trafficking for labour exploitation (other than official statistics elsewhere mentioned). These may be academic studies or those produced by NGOs or regulatory bodies. Any citing case studies of good practice are of particular interest:**

Both before and after 2010 there were a very few studies carried out in Lithuania relating to trafficking for labour exploitation.

In 2010, in the context of implementation of the project “Mapping of Victims of trafficking for labour exploitation”, focused on anti-trafficking in women and children for forced labour, the Women’s Issues Information Centre ([MIC](#)) conducted a national study of the Spread of Forced Labour in



Lithuania. The study revealed that many people still do not recognise or, due to certain stereotypes, do not associate slave labour with the crime of human trafficking. Therefore, in Lithuania such cases usually do not reach courts and there is no case-law relating to forced labour crimes in Lithuania.<sup>1</sup>

In 2011, a [study](#) was carried out in Lithuania with a view to identifying the most appropriate model of a national rapporteur on trafficking in human beings. The study tasks covered a survey of officers from responsible Lithuanian institutions and organisations. The survey showed that the most appropriate model of a national rapporteur for Lithuania would be state institutions performing the functions of a coordinator of anti-trafficking activities, supplementing their functions with the function of a national rapporteur.<sup>2</sup>

A statistical [study report](#) on Trafficking in Human Beings published by the Eurostat in 2013 reported a gradual decrease of identified victims of trafficking over the period of 2008-2010 in Lithuania. In 2008, there were 25 women and girls identified as trafficking victims in Lithuania (including 4 minor girls); in 2009 this number was 14 women and girls (including 5 minor girls), and in 2010 – 3 persons (one men and two women including one minor girl). Compared to other EU countries in 2010, the Lithuanian number was one of the smallest.<sup>3</sup> According to another study, the low official indicative number of victims in Lithuania does not mean that the problem does not exist or that it is of a small scale. As already mentioned (see Section 2) there is a set of conditions that complicates the identification of victims. According to the [research](#), Lithuanian authorities take a very conservative approach by counting as victims only those individuals who report crime to the police and agree to testify in court against crime perpetrators.<sup>4</sup>

As already mentioned a study “Exploitation of migrant workers in Finland, Sweden, Estonia and Lithuania: Uncovering the links between recruitment, irregular employment practices and labour trafficking” was published in 2013. In this study a chapter on “Lithuanian migrants as victims of human trafficking for forced labour and labour exploitation abroad” is presented. During this research 13 stories about human trafficking for forced labour to Ireland, the UK, Spain, Netherlands, Sweden, Germany, Norway and the Czech Republic were collected. It was found that in most cases victims of human trafficking for forced labour are very young or elderly men, asocial persons, and those socially at risk, mostly rural residents, although it also occurs in cities, and it rarely affect the women. It was established that the freedom of victims of human trafficking for forced labour is restrained using the

---

<sup>1</sup> Annual Report 2010 of the Women’s Issues Information Centre. Available at: <http://lygus.lt/mic/apie-mus/>

<sup>2</sup>

<http://www.lrvk.lt/bylos/LESSED%20projektas/Dokumentai/pranesejas%20prekybai%20zmonemis%20galutine%20ataskaita%20%282012-06-28%29.pdf>

<sup>3</sup> [3] [https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/trafficking\\_in\\_human\\_beings\\_-\\_dghome-eurostat\\_en\\_1.pdf](https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/trafficking_in_human_beings_-_dghome-eurostat_en_1.pdf)

<sup>4</sup> [3] [https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/trafficking\\_in\\_human\\_beings\\_-\\_dghome-eurostat\\_en\\_1.pdf](https://ec.europa.eu/anti-trafficking/sites/antitrafficking/files/trafficking_in_human_beings_-_dghome-eurostat_en_1.pdf)

means of fraud, by not paying wages and forming artificial debts, degrading human dignity, and using the threat of physical and psychological violence. The victims are defrauded about the status of their future job, work and living conditions, they work overtime (sometimes not having a single day of rest, while the workday lasts from early morning till late night), have no social security, are isolated and encounter difficulties when living in unfamiliar environment. It was found that the majority of victims of human trafficking for forced labour worked in agriculture, construction, and in factories. In the less common cases of trafficking the victims collected charity, worked in car wash and tourism inventory maintenance businesses. A number of sources reported about the trade in women, forcing them to marry third-country nationals. The data shows that most victims do not seek help and tend to deny that they have become victims of human trafficking. Most of the victims do not realise their own experience as human trafficking for forced labour, and view it as cheating or fraud. For this reason there is the possibility of repeated victimisation. This is more common among lower social classes and alienated people. Others tend to deny their experiences, since the trauma and patriarchal socialisation does not allow them to admit that they had become victims of human trafficking. It was found that even when victims realised that they were in a situation of labour exploitation, they do not seek help by themselves, they do not know where to turn to, do not believe that anyone can help them, or are afraid to apply for help because of previously committed criminal offences. It was found that the cases of trafficking for forced labour are often made known indirectly when the families of victims seek assistance or victims come to NGOs with other problems. According to the experts interviewed in the study, the small number of identified victims cannot be explained solely by the reluctance of victims to seek help, or by the lack of possibilities to seek assistance. Identification of cases and the following legal procedures depend on the qualifications of the personnel of the police and prosecutor's office and their ability to identify the victims, the understanding and adequate treatment of the problem by all those involved in the legal procedures related to human trafficking for forced labour, which experts currently miss.<sup>5</sup>

## **8. Views of social partners**

**Please give details of the views of the social partners on trafficking for labour exploitation:**

Although the social partners in Lithuania generally strongly oppose to any trafficking for labour exploitation, they are not very active in tackling the problem. Their activities are usually limited to publication of information on projects implemented in the country on the topics at issue or information on other likely risks relating to human trafficking and forced labour. As it was mentioned above, some national trade unions place information about labour and employment conditions abroad on their websites that is useful for emigrants.

## **9. Public discussion**

**Has there been any recent political or media discussion of trafficking in general, and specifically relating to LMIs? Please give details.**

---

<sup>5</sup> <http://www.cbss.org/wp-content/uploads/2012/11/HEUNI-report-75-15102013.pdf>

In Lithuania, human trafficking (in particular, forced labour) is not a topic very frequently discussed in public spaces. However, attention to and concerns of politicians and of the general public about this problem have been recently growing. There has been the growing number of social advertisements in the country; these topics are more openly discussed in secondary schools and higher education institutions. It should be noted that in public spaces human trafficking is still quite often related to explicit violence and abuse (sexual abuse) in Lithuania. Yet, there are increasing [opinions](#) that the human trafficking phenomenon is changing its face in Lithuania, acquiring more delicate and better concealed forms: not only women are trafficked, but men and children as well; there appear new trafficking trends, including labour exploitation ([Lietuvos rytas](#), 2014). As these forms are more difficult to recognise and to prove, identification of certain human trafficking cases is quite problematic.

Public discussions relating to LMIs are not numerous in Lithuania. There are occasional discussions of victims of forced labour abroad, but the role of LMIs in such cases is not always clear. More frequent are complaints that LMIs apply charges for their job search services which is inconsistent with Law [No. IX-2016](#) of the Republic of Lithuania on the Ratification of the Private Employment Agencies Convention, stipulating that employment agencies in Lithuania shall not charge any direct or indirect fees to job-seekers for labour market intermediation services.

## **10. Comments from national correspondents**

### **Do you have any further comments of relevance to the theme of this study?**

The available information and results from the conducted studies obviously indicate the existence of the problem of trafficking for labour exploitation in Lithuania. However, this problem is not yet clearly apprehended and identified in the general public and, as a result, is actually not reflected in official statistics.

As it was mentioned, the issue of trafficking for labour exploitation is actually not related to LMIs. The role of the social partners is not significant in this area too.