

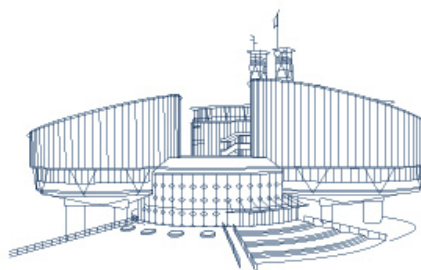
PRESS RELEASE

NO SHORTCOMINGS IN LATVIAN AUTHORITIES' RESPONSE TO ALLEGATIONS OF FORCED LABOUR AND SERVITUDE

A.S. v. Latvia

ECHR 212 (2026) 03.09.2026

Issued by the Registrar of the Court



In today's **Chamber** judgment¹ in the case of **A.S. v. Latvia** (application no. 9327/23) the European Court of Human Rights held, unanimously, that there had been **no violation of Article 4 (prohibition of slavery and forced labour)** of the European Convention on Human Rights.

The case concerned the applicant's allegations that she had been subjected to servitude or, alternatively, to forced or compulsory labour while working on a dairy farm between December 2016 and May 2017. The operator of the farm was acquitted of charges of human trafficking in 2022.

The Court found that A.S.'s complaint had been taken seriously by the national authorities. It had been thoroughly investigated and examined at three levels of jurisdiction. The authorities had taken a significant number of investigative steps to secure the relevant evidence, and they had not failed to pursue any obvious line of inquiry. The investigation had been prompt and thorough and A.S. had been legally represented throughout. The Court did not find any significant flaws capable of undermining the proceedings' ability to establish the circumstances of the case or the identity of those responsible.

1. Under Articles 43 and 44 of the Convention, this Chamber judgment is not final. During the three-month period following its delivery, any party may request that the case be referred to the Grand Chamber of the Court. If such a request is made, a panel of five judges considers whether the case deserves further examination. In that event, the Grand Chamber will hear the case and deliver a final judgment. If the referral request is refused, the Chamber judgment will become final on that day.

Once a judgment becomes final, it is transmitted to the Committee of Ministers of the Council of Europe for supervision of its execution. Further information about the execution process can be found here: www.coe.int/t/dghl/monitoring/execution.

PRINCIPAL FACTS AND COMPLAINTS

The applicant, A.S., is a Latvian national who was born in 1957 and lives in Cēsis (Latvia).

In December 2016 she answered a job advertisement seeking workers for a dairy farm. During her telephone conversation with D.G., the operator of the farm, A.S. expressed interest in the job and enquired about the possibility of living on the farm. D.G. suggested that she rent a room in the nearby village.

On 20 December 2016 A.S. arrived at the farm with her belongings and insisted on staying there. It was agreed that she would carry out two milking sessions a day. The parties did not sign a written contract. During the period in question, D.G. purchased groceries, food, cigarettes and pre-paid phone cards for A.S., at her request, and gave her 50 euros to see a doctor. A.S. asked D.G. about her salary several times and was told that the dairy processing company had withheld payments and he would pay her when he received the money. On 4 May 2017 D.G. removed the livestock and dairy processing equipment from the farm and moved out.

Shortly after A.S. lodged a complaint with the State Labour Inspectorate concerning the non-payment of her wages. On 18 May 2017 it forwarded A.S.'s complaint to the police, who initiated criminal proceedings against D.G. on charges of human trafficking.

After D.G. was initially convicted of human trafficking at first instance, the case was reconsidered on appeal, following a remittal by the Supreme Court. D.G. was ultimately acquitted, and that decision became final in October 2022.

Relying on Article 4 (prohibition of slavery and forced labour), the applicant complained that working on the farm she had been subjected to servitude, or alternatively, to forced labour argued that the Latvian authorities had failed to provide an adequate legal framework prohibiting punishing such treatment and had failed to investigate her allegations effectively.

OUTCOME REASONING OF THE COURT

Firstly, the Court considered that A.S. had raised an arguable claim, supported by prima facie evidence, of forced labour or servitude within the meaning of the Convention to the national authorities. She had alleged that she had been recruited on the promise of remuneration, which had not been paid, and that she had lived on the employer's property throughout the period in question. She had worked there for several months, had allegedly depended in practice on D.G. for food, medications and essential supplies. She had remained on the farm in circumstances of prolonged non-payment and limited practical alternatives. Article 4 was applicable.

The Court found that Latvia had in place a legal framework which could, in principle, provide effective protection against the treatment alleged by A.S. It disclosed no deficiency of the kind that had led the Court to find a violation of the obligation to provide an appropriate framework in comparable cases.

As to the effectiveness of the investigation, the Court observed that once A.S.'s complaint had been forwarded to the police and criminal proceedings had been opened, the national authorities had not treated the matter as a mere labour dispute and D.G. had been charged with human trafficking. Criminal proceedings had been instituted within days of the receipt of

the State Labour Inspectorate's referral, and an on-site examination of the farm had been carried out three days later. The proceedings had been conducted with reasonable expedition. The authorities had taken a significant number of investigative steps to secure the relevant evidence, and they had not failed to pursue any obvious line of inquiry. A.S. had been interviewed on several occasions. The case had then been examined at three levels of jurisdiction, including following the Senate of the Supreme Court's remittal for further examination of the evidence. A.S. had been legally represented throughout the proceedings and had been involved in the procedure at all stages.

In response to A.S.'s central grievance that the national courts had ultimately acquitted D.G., the Court reiterated that an acquittal did not in itself disclose a violation of Article 4 of the Convention unless there had been significant shortcomings in the proceedings. The Court considered that the appellate court had been entitled to take account of the fact that A.S. had been able to leave the farm freely, to maintain regular contact with her sister by mobile telephone, to return voluntarily following a visit and to request and receive money from D.G. The national courts had concluded that the specific elements of vulnerability required under the national law had not been established.

Taking the proceedings as a whole, the Court found that the investigation had been prompt and thorough. It had been conducted on the State's own motion without placing any procedural burden on A.S., had employed a range of investigative measures and had secured evidence from a substantial number of sources. A.S. had been legally represented throughout and had been provided with access to victim support and compensation. D.G. had been acquitted following adversarial proceedings conducted within an adequate legal framework. There had been no significant flaws capable of undermining the proceedings' ability to establish the circumstances of the case or the identity of those responsible.

There had therefore been no violation of Article 4.

PROCEDURE AND COMPOSITION OF THE COURT

The application was lodged with the European Court of Human Rights on 17 February 2023.

Judgment was given by a Chamber of seven judges, composed as follows:

Ivana Jelić (Montenegro), *President*,
Erik Wennerström (Sweden),
Raffaele Sabato (Italy),
Frédéric Krenc (Belgium),
Alain Chablais (Liechtenstein),
Artūrs Kučs (Latvia),
Anna Adamska-Gallant (Poland),

and also Ilse Freiwirth, *Section Registrar*.

The judgment is available only in English.

The Court's judgments finding a violation are binding on the State concerned. The [Committee of Ministers](#) of the Council of Europe, the executive body of the Council of Europe, supported by the [Department for the Execution of Judgments of the European Court of Human Rights](#), is responsible for supervising their implementation.

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Press contacts

✉ echrp@echr.coe.int | tel.: +33 3 90 21 42 08

Media enquiries are welcome by email or phone.

Claire Windsor (tel: + 33 3 88 41 24 01)

The European Court of Human Rights was set up in Strasbourg by the Council of Europe member States in 1959 to deal with alleged violations of the 1950 European Convention on Human Rights.