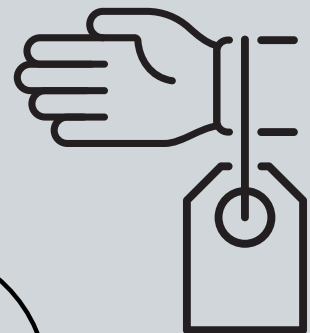




# A ROADMAP FOR SWEDEN

**EFFECTIVELY IDENTIFYING, DISRUPTING AND  
COUNTERING TRAFFICKING IN HUMAN BEINGS  
FOR LABOUR EXPLOITATION**



This publication is based on the results from the CAPE project which was jointly led by the Council of the Baltic Sea States and the Swedish Gender Equality Agency.

The views expressed in this publication do not necessarily represent the opinions or positions of the Council of the Baltic Sea States (CBSS), its officials, or its Member States.

Published by:  
Council of the Baltic Sea States (CBSS) Secretariat  
Wollmar Yxkullsgatan 23, 118 50 Stockholm, Sweden

For bibliographic purposes, this document should be cited as: "Effectively identifying, disrupting and countering THB for labour exploitation: A Roadmap for Sweden. (CBSS, 2025)"

© Council of the Baltic Sea States (2025)

All rights reserved. Information included in this publication, or extracts thereof, may be reproduced without prior consent, provided that the complete reference to the publication is given as per the citation instructions or any other appropriate way. This excludes images and graphic elements that are not the property of the CBSS and are identified as such.

# CONTENTS

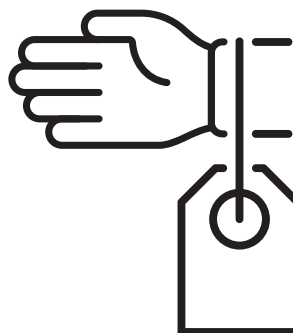
<b>1. Forced labour and labour exploitation in Sweden</b>	<b>5</b>
1.1. Increasing form of human trafficking	5
1.2. Labour sectors affected	6
1.3. Victim profiles	6
1.4. Forced labour as organised crime	7
1.5. Forced labour as a gendered crime	7
<b>2. Institutional Framework</b>	<b>9</b>
<b>3. Conclusions For The Path Ahead – A Roadmap</b>	<b>10</b>
3.1. Prevention	10
3.2. Legislation And Implementation	13
3.3. Law Enforcement Agencies and Investigations	16
3.4. Labour Inspections	20
3.5. Victim Assistance and National Referral Mechanisms	24
3.6. Access To Rights and Remedies	28
3.7. Awareness Raising	32
Notes	35
References	38

# INTRODUCTION

To address the emerging issue of Trafficking in Human Beings (THB) for forced labour and labour exploitation in Sweden and the Baltic Sea Region, the Council of the Baltic Sea States and the Swedish Gender Equality Agency initiated the CAPE project<sup>1</sup> in 2019, divided into four different sub-projects lasting until December 2024. The project recognised the need to deepen the overall knowledge about THB for forced labour and labour exploitation to overcome institutional challenges hindering effective action. Furthermore, the project contributed to increasing the knowledge and know-how of anti-trafficking practitioners in both Sweden and the Baltic Sea Region through a variety of activities. Overall, the CAPE projects have through the years added significant value to the fight against forced labour and labour exploitation in Sweden and likely contributed to putting the issue of labour exploitation on the political agenda in Sweden and in the region.

In order to capture the extensive knowledge and findings from the CAPE project, the work has been summarised into a **Roadmap** outlining how to effectively identify, disrupt, and combat human trafficking for labour exploitation and forced labour. This Roadmap is the result of the five-year CAPE project and is grounded in numerous research reports from Sweden and the Baltic Sea Region, findings and good practices from study visits to Belgium, Finland and Germany, webinars, workshops and an international conference. Finally, the good practices resulting from the project have been validated through interviews conducted in 2024 with Swedish state authorities and NGOs. The validation meetings<sup>1</sup> were organised in person and online and included questions and focus on current challenges and good practices as well as institutional frameworks required in order to effectively address human trafficking for labour exploitation in Sweden.

By building on the collective knowledge and experiences gained throughout the CAPE project, this Roadmap intends to guide Swedish institutions and bodies through actionable steps for strengthening national and regional responses to labour exploitation, enhancing cooperation, and driving meaningful change in the fight against human trafficking for forced labour and labour exploitation.



---

<sup>1</sup> The validation meetings included the following Swedish stakeholders: The Work Environment Authority, the Police Authority, the Prosecution Authority, the Regional Coordinators against THB, the Tax Agency, the Delegation against work-related crime, trade union representatives, civil society organisations

## 1

# FORCED LABOUR AND LABOUR EXPLOITATION IN SWEDEN

## 1.1. INCREASING FORM OF HUMAN TRAFFICKING

Trafficking in Human Beings (THB) for labour exploitation and forced labour is a low-risk, high-profit crime with severe consequences for both the individuals involved and society at large, including the labour markets. Although Sweden has been considered a leader in addressing THB, particularly in addressing and preventing human trafficking for sexual exploitation by tackling demand as a driving factor, Sweden has in recent years lagged behind in countering THB for labour exploitation and forced labour, although measures and actions from Swedish governments in the recent years have clearly allocated political priority and resources to combat criminal elements and exploitation in the Swedish labour markets, including human trafficking.

Although an evident political will, and funds<sup>[8]</sup>, to counter the grey economy, work-related crimes and undeclared work can be noted from the Swedish Governments in recent years, the CAPE project has been able to pinpoint challenges concerning specifically human trafficking for forced labour and labour exploitation. Although forced labour is a phenomenon closely tied to the grey economy and undeclared work, the need to address the specific challenges of human trafficking becomes increasingly clear when analysing court cases and convictions related to forced labour and exploitation in Sweden. The lack of convictions<sup>[9]</sup> highlights legal and enforcement issues about the human trafficking crime and underlines the importance of allocating increased focus on this particular crime.

The situation comes across as increasingly concerning, also when observing data and indications from the Baltic Sea Region indicating a rise in human trafficking for forced labour and labour exploitation. In some states in the region, this form of human trafficking has surpassed sexual exploitation as the most common recorded form of human trafficking. Reports shedding light on the issue on a global scale suggest that labour exploitation might even be as prevalent as sexual exploitation.<sup>[10]</sup> This is now the reality and outcome also in Sweden, when official figures presented by the Swedish Gender Equality Agency in 2023 declared that the Regional Coordinators in Sweden identified more presumed victims of forced labour and labour exploitation than sexual exploitation, and where men make up for the majority of the identified presumed victims in labour exploitation.<sup>[11]</sup>

Equally, the Swedish Migration Agency statistics show that forced labour and labour exploitation were the most commonly recorded forms of human trafficking among the presumed victims they had identified.<sup>[12]</sup> Although it cannot

Human trafficking for labour exploitation and forced labour is a growing concern in Sweden and the Baltic Sea Region, with recent data indicating it now surpasses sexual exploitation in prevalence, highlighting the urgent need for targeted legal, institutional and policy responses.

be settled definitively whether the statistical increase should be interpreted as a real increase, or if it is due to increased attention to the crime and related phenomena by state agencies, the overall analysis concerning Sweden and the region concludes that the issue needs to be addressed urgently as it continues to pose a severe threat to migrant workers getting exploited, as well as to the state, institutions, and the labour market. On a positive note, one conclusion which can be drawn is that when authorities pay attention to the crime, they will begin to identify cases.<sup>[13]</sup>

Mitigating these risks and preventing, identifying and prosecuting human trafficking for forced labour and labour exploitation within the Swedish labour market requires a multifaceted approach, including effective legislation and policies, adequately funded institutions with clear mandates and instructions to prevent this specific crime, updated research and political commitment.

---

## 1.2. LABOUR SECTORS AFFECTED

---

Forced labour and labour exploitation have been identified in a number of labour sectors in Sweden, such as, but not limited to, the agricultural sector, construction and work sites, nail salons, restaurants, car wash services, and berry picking.<sup>[14]</sup> Based on the available data, it cannot be determined whether the labour sectors where forced labour and exploitation have been identified are inherently more vulnerable to these crimes in Sweden, or if the number of identified cases and sectors is influenced by how authorities detect these cases and the level of awareness regarding exploitation in certain industries. If the identified cases come from sectors that are easier to monitor or inspect, such as construction or berry picking, this will affect the types of cases and sectors being reported and recorded by authorities. Other sectors, such as the cleaning sector, domestic work, and the au pair sector, are more challenging for authorities to jointly inspect using traditional work inspection methods, as these jobs often take place in isolated environments, such as closed workplaces or private homes.<sup>[15]</sup> These sectors are usually dominated by female workers.

Forced labour and labour exploitation in Sweden have been identified across multiple sectors, including construction, agriculture, hospitality, beauty services, and domestic work, though detection challenges may obscure the full scope.

---

## 1.3. VICTIM PROFILES

---

The presumed victims of forced labour and labour exploitation in Sweden are typically individuals from poor socio-economic backgrounds, irregular migrants and/or persons in need of some occupation to make ends meet or to support other persons such as their families. The majority identified are men.<sup>[16]</sup> The most frequent countries of origin differ from year to year, although common countries of origin in a Swedish labour exploitation context in recent years have been (in alphabetical order) Bulgaria, Romania, Thailand and Ukraine.<sup>[17]</sup>

Labour migrants, or migrants who for different reasons end up being exploited in forced labour and labour exploitation in the region, including Sweden, have a variety of reasons for seeking jobs abroad and apply different strategies and take different roads to find a job opportunity. Studies commissioned by the CBSS within the frame of the CAPE project, in which Lithuanian migrant workers were interviewed, suggest that the reasons for labour migration can range from

Presumed victims of forced labour and labour exploitation in Sweden are predominantly men from low socio-economic backgrounds, often irregular migrants, with common countries of origin including Bulgaria, Romania, Thailand and Ukraine.

being strictly economical, with better salaries being promised abroad, to personal reasons and wanting to try out living a *new* life abroad.<sup>[18]</sup> Some may turn to public employment agencies advertising job opportunities abroad, although a significant number of the interviewees turn to social media, friends and networks, and/or middlemen and recruitment companies to obtain a job abroad, sometimes even being aware of the potential risks of being exploited.<sup>[19]</sup> Certain interviewees underscored that the only information they might have about the job, geographical location and employer is a phone number and the first name of an unknown person.<sup>[20]</sup>

---

#### 1.4. FORCED LABOUR AS ORGANISED CRIME

---

Human trafficking is a serious form of organised crime<sup>[21]</sup> generating considerable profits<sup>[22]</sup>, and where the perpetrators, schemes and businesses may operate in both cross-border and domestic settings.<sup>[23]</sup> Equally, human trafficking for labour exploitation can be run in smaller settings, not necessarily connected to large-scale human trafficking criminal networks, which may also pose severe threats to our states and institutions, as well as to the safety of the citizens in the region. All these crime structures may generate profits through various human trafficking schemes where others are exploited; forced criminality, labour exploitation, benefit fraud and financial fraud. Equally, labour exploitation cases in Sweden can be linked to both organised crime as well as human trafficking taking place in smaller settings with unscrupulous employers and companies being the perpetrators, rather than sophisticated criminal networks.

The intertwined characters of work-related crime, the grey economy, undeclared work and organised crime have further resulted in combining efforts and cooperation between the established Swedish Regional Centres against Work-related Crime and the Regional Intelligence Centres which are set up in connection to the governmental initiative against organised crime.<sup>[24]</sup>

Moreover, a recent report from the Council of the Baltic Sea States which seeks to legally conceptualise the interaction between human trafficking and benefit fraud, concludes that these phenomena are clearly intertwined, with case examples illustrating how traffickers also utilise the details of their victims, such as passports and identity cards, to commit other crimes, commit benefit fraud and take advantage of the welfare state and system.<sup>[25]</sup>

Human trafficking for labour exploitation in Sweden is increasingly linked to both organised crime networks and smaller-scale operations, with perpetrators profiting through interconnected schemes involving forced labour, benefit fraud and exploitation of the welfare system.

---

#### 1.5. FORCED LABOUR AS A GENDERED CRIME

---

Human trafficking is deeply influenced by gender dynamics, with women and girls disproportionately impacted, especially through sexual exploitation. In contrast, men and boys are more frequently subjected to labour exploitation and forced criminality.<sup>[26] [27]</sup> However, addressing the gender aspect of human trafficking also involves recognising that men and boys can be victims of, and are victimised in, sexual exploitation, and that women are particularly vulnerable to exploitation in labour sectors, including sectors traditionally coded as “feminine,” such as domestic work, nail salons and the au pair industry, and which are more difficult to conduct inspections in. Recognising the gender dimension of forced

Forced labour is a gendered crime: men are more often identified as victims of labour exploitation, while women face risks in sectors like domestic work—yet stereotypes continue to obscure victims.

labour and labour exploitation should also entail that stereotypical perceptions of how a victim should look and behave are addressed, in order to avoid a situation where a female presumed victim of forced labour is overlooked and remains unidentified, e.g. in the agricultural sector, because the typical victim in this setting is believed to be male.

Recognising the gender dynamics in human trafficking also involves acknowledging that male victims are often overlooked, as there is a tendency to perceive male workers in contexts of labour exploitation as something other than victims.



# 2

## INSTITUTIONAL FRAMEWORK

There are several authorities mandated to either coordinate efforts against human trafficking and labour exploitation, gather data or in various ways identify and prosecute the crime - through governmental mandates, assignments and instructions or due to the nature of their work. Due to the nature of human trafficking, being interlinked with other related crimes, there are also authorities tasked with governmental assignments to cooperate in inter-agency settings to detect criminality taking place in the Swedish labour market, also known as work-related crimes.<sup>[28] [29]</sup> The main authorities and functions in Sweden involved in the work against human trafficking and labour exploitation are:

**Swedish  
Gender  
Equality  
Agency**

**Swedish  
Police  
Authority**

**Swedish  
Prosecution  
Authority**

**The Work  
Environment  
Authority**

**The  
Migration  
Agency**

**The Swedish  
Tax Agency**

**Regional  
Coordinators**

**Social  
Services**

## 3

## CONCLUSIONS FOR THE PATH AHEAD – A ROADMAP

### 3.1. PREVENTION

#### 3.1.1. Strong labour rights as a safeguard against exploitation

Strong labour rights can have a significant preventive role in combatting human trafficking for labour exploitation. Reports written during the CAPE project about labour exploitation in Germany and Poland highlight the critical need for robust regulation of employment contracts.<sup>[30] [31]</sup>

In Poland, for instance, one major issue is so-called garbage contracts, which lack provisions for employment protection, pay protection, and holiday entitlement. They are often used when hiring migrants who may not fully understand the conditions stipulated in the contract due to language barriers, leaving them vulnerable to exploitation. This problem is exacerbated by gaps in legislation, as the Polish Labour Code imposes only minimal requirements for working conditions, pay, and contract types. Such legislative shortcomings allow employers to circumvent protections, exposing workers to exploitative practices and fostering a culture where labour rights violations are tacitly accepted.<sup>[32]</sup> The example demonstrates how adequate laws governing labour rights provide an essential foundation for a society that actively prevents labour exploitation.

Furthermore, sustainable prevention of human trafficking for labour exploitation requires political attention not only to immediate exploitative practices but also to the systemic factors that enable them. These include structural features of the global economy, such as the demand for cheap labour, and the adequacy of welfare systems in supporting vulnerable populations. Recognising these complex and interconnected factors in the process of political decision-making and legislative changes is an essential pre-condition for creating a framework of labour rights that effectively roots out exploitation.<sup>[33]</sup>

#### 3.1.2. The role of corporate due diligence policies

While the state is responsible for enforcing the protection of labour rights, businesses also have a responsibility to ensure that the human rights of their workers are respected. To fulfil this obligation, companies need to take action to ensure that their activities and supply chains are free of exploitation. Legislation can contribute to keeping businesses accountable and promoting enhanced self-regulation practices.

A good practice example highlighted during the CAPE project is Germany's Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains, which entered into force in 2023. The law applies to German companies that

Strengthening labour rights and regulating corporate due diligence are key to preventing labour exploitation, with legal frameworks and political commitment needed to address both immediate abuses and the systemic factors enabling human trafficking.

have at least 1000 employees. It obliges companies to, for example, establish a risk management system to identify, prevent, or minimise the risk of human rights violations, have a complaint procedure in place, and take remedial action if violations are discovered. If companies do not implement the required measures, they are subject to a fine.<sup>[34]</sup>

The law is not without its weaknesses. For example, it has been criticised for having vague disclosure requirements and weak provisions regarding risk analysis for indirect suppliers. These issues can reduce its impact in addressing deeper, systemic exploitation. Nevertheless, it provides a significant strengthening of the framework of corporate social responsibility regarding labour exploitation.<sup>[35]</sup> This example highlights how legislation can not only incentivise businesses to take responsibility but also contribute to building a global supply chain that prioritises human rights and labour protections.

In Sweden, companies can implement due diligence mechanisms on a voluntary basis. Some corporations do publicly share their social sustainability policies and action plans. However, without legislative guidance, the practices are inconsistent and often inadequate to comprehensively address labour exploitation. Charting ways to regulate corporate due diligence is particularly timely due to the EU Corporate Due Diligence Directive, which entered into force in July 2024 and requires large companies to identify and address human rights and environmental impacts of their activities.<sup>[36][37]</sup> The process of integrating its requirements into Swedish law provides an opportunity to ensure that labour exploitation, both within the direct operations of companies and across their supply chains, is adequately considered.

### 3.1.3. ACTIONS TO TAKE: PREVENTION

- #1 — **Include labour exploitation as a specific topic** in National Action Plans on topics relating to Businesses and Human Rights.
- #2 — **Address the interlinkages** between business, due diligence, and human rights in National Action Plans against human trafficking.
- #3 — Ensure that the national authority, working group or entity overseeing the implementation of the EU Corporate Sustainability Due Diligence Directive has a **strong mandate that addresses labour exploitation concerns**, such as by establishing a working group focused on this issue.
- #4 — **Strengthen access to remedies for workers** exploited through corporate practices and supply chains in the national enforcement of the EU Corporate Sustainability Due Diligence Directive.

---

## 3.2. LEGISLATION AND IMPLEMENTATION

---

### 3.2.1. Legal framework – trafficking in human beings

Trafficking in Human Beings was introduced in the Swedish penal code in 2002 and has been subject to amendment on three different occasions. Rather few convictions have been recorded in Sweden regarding human trafficking for forced labour, despite the several amendments.

The crime encompasses several forms of exploitation, one of which is human trafficking for forced labour.

In 2018, the Swedish Government introduced a new legislation called Human Exploitation. When the government proposed the crime of human exploitation, it rejected a proposal from the 2014 Human Trafficking Inquiry for a crime addressing improper economic exploitation.

### 3.2.2. The importance of effective legislation

Two reports commissioned by the CBSS conclude that no convictions for human trafficking for forced labour have been recorded in Sweden since 2012. Moreover, the analysis suggests that it may even be difficult to understand why the court concludes that a case is in fact human trafficking for forced labour, as the court has not elaborated the reasons. This vagueness in court reasoning presents a challenge, because it can complicate efforts to interpret legal standards and apply the law effectively in future cases.<sup>[38] [39]</sup>

Swedish courts have applied a narrow understanding of “forced labour,” and have required substantial evidence of coercion. This interpretation is not in line with international definitions, such as the International Labour Organization (ILO) definition, which recognises more subtle forms of coercion, such as economic or psychological pressure, as sufficient to constitute forced labour.

Additionally, the legislation in Sweden demands proof of highly specific conditions, such as “clearly unreasonable terms” or “obvious dependence.” These requirements place a heavy burden on prosecutors, who must prove not only the exploitation but also that the exploitation took place in such settings as formulated by the legislation. Such requirements are especially problematic in cases of labour exploitation, where the circumstances might not always meet the high thresholds outlined by the law, even though they are clearly exploitative by international standards.

Amendments in the legislation in 2018 were intended to address some of these issues, such as ensuring that “forced labour” is interpreted in line with international standards. However, the practical application since the amendment has been inconsistent. Courts and prosecutors often revert to previous practices, and there remains a lack of clarity on how the new definitions should be applied.<sup>[40]</sup>

Despite legislative efforts, Sweden has struggled to secure convictions for human trafficking for forced labour, with narrow legal interpretations, high evidentiary thresholds, and inconsistent application by courts hindering effective enforcement and highlighting the need for clearer legal standards and improved prosecutorial guidance.

Moreover, interviews with Swedish state authorities, as well as presentations by Swedish law enforcement agencies carried out during the CAPE activities, conclude that the prospects of convicting a perpetrator for human trafficking for forced labour in Sweden are small given the current interpretation by courts, even for senior prosecutors specialised in the crime of human trafficking.

The human trafficking legislation in Belgium could potentially be a source of inspiration, as it explicitly references violations of *human dignity* in the context of labour exploitation – or economic exploitation. Through its legislation, Belgium not only underlines the very illegal nature of labour exploitation but also the human and moral aspects, addressing the serious degradation of individuals who are exploited and taken advantage of in inhumane labour conditions.

### 3.2.3. Interviews with Swedish state agencies

In the context of the CAPE IV interviews, Swedish stakeholders shared diverse insights on the state of the legislation, implementation, and enforcement concerning labour exploitation and THB. While there are promising legislative advancements, significant gaps remain regarding the enforcement.

A recurring theme was the acknowledgement of the potential for improvement in Sweden's legal frameworks, especially concerning the practical application of existing laws.

Stakeholders highlighted the significance of the newly introduced *LUFFA legislation*, which has bolstered inter-agency cooperation by enabling better information sharing, particularly under the A-Krim framework. This legislation has been well received, with authorities already collaborating to identify high-risk employers in sectors employing foreign workers. Despite this progress, stakeholders emphasised that the legislation is still in its early stages. Effective implementation will require the development of standardised routines, comprehensive training, and a cultural shift among authorities to ensure a proactive approach toward combatting labour exploitation.

A concern expressed during the interviews was the limited application of Sweden's legislation on THB and human exploitation. This has led to challenges in bringing cases to court, with stakeholders noting the lack of guidance for prosecutors and investigators. Swedish judges, too, often face difficulties applying the legislation in court and do not apply the international definition, which makes convictions difficult to achieve.<sup>[61]</sup>

Stakeholders repeatedly stressed the low prosecution and conviction rates as a major weakness. More specifically, stakeholders noted a disparity between the number of several hundred reports on labour exploitation, compared to the very few investigations initiated. This disparity was attributed to a combination of structural and procedural issues. At the early investigation stages, law enforcement authorities inaccurately classify labour exploitation cases as other offences, such as fraud. Furthermore, the judicial process is hindered by the rather widespread perception that criminal investigations are too time-consuming and complex in relation to the chances of the case reaching conviction.

### 3.2.4. ACTIONS TO TAKE: LEGISLATION AND IMPLEMENTATION

- #5 — **Review legislation:** Evaluate the human trafficking legislation to ensure it adequately addresses human trafficking for forced labour. Sweden could look to Belgium's legislative framework, which emphasises the human dignity aspect of labour exploitation, as a potential model to incorporate into its own legislation, ensuring a broader scope of protection for victims and more effective prosecution of traffickers. It is important that any new or revised legislation has a strong focus on the crime victim's perspective.
- #6 — **Provide specialised trainings or support material for judges:** Integrate comprehensive training on human trafficking, with a focus on forced labour, into judicial education programmes. This would help ensure courts apply international definitions and better understand the complexities of such cases. Another solution could be to create written guidance material that can support judges who are allocated human trafficking cases.

### 3.3. LAW ENFORCEMENT AGENCIES AND INVESTIGATIONS

#### 3.3.1. Capacity-building for law enforcement officers

Successfully investigating human trafficking for labour exploitation requires that law enforcement officers, mainly police, have adequate knowledge, skills and resources to understand and investigate the particularities of the crime. The importance of providing regular training for law enforcement is highlighted in multiple reports produced within the CAPE project.<sup>[42] [43] [44] [45]</sup> In the Swedish context, police officers may find investigating human trafficking for labour exploitation is complicated, because in contrast to trafficking for sexual exploitation, the activity itself can occur in a legal context, and the exploitation within it is hidden. Additionally, there are often complex financial, corporate and labour law issues that are difficult to investigate, especially in retrospect. Moreover, police officers sometimes lack the necessary competency to utilise the investigative techniques required to investigate possible cases of human trafficking for labour exploitation effectively.<sup>[46]</sup>

For example, enhancing police officers' familiarity with surveillance techniques can help build stronger cases. Information generated from the CAPE project and the validation meetings with Swedish stakeholders conclude that although the testimony of the victim can be crucial in criminal proceedings, and to convict a perpetrator for human trafficking, the risk is equally that the investigation, and the success rate of the conviction, is too dependent on the willingness of the victim to testify. In this regard, surveillance is a critical but underutilised tool in building human trafficking cases, specifically for forced labour and labour exploitation. While it has been effectively used in cases of sexual exploitation and forced begging, its potential in labour cases has not been fully explored. An effective use of surveillance techniques can facilitate more comprehensive case-building and increase the likelihood of securing convictions against traffickers.

To provide law enforcement officers with the knowledge to use the right tools and techniques, law enforcement agencies in Sweden, particularly the police and border police, need standardised investigation protocols and regular training focused on human trafficking for forced labour and labour exploitation. The Swedish Police Authority is currently participating in the development of an Investigation Protocol on Human Trafficking for the Baltic Sea Region, which is an activity funded by the Government Offices of Sweden and coordinated by the Council of the Baltic Sea States. It is evident, also based on interviews with Swedish law enforcement representatives, that the Swedish Police Authority needs practical competence on human trafficking investigations, which can serve as a guiding tool especially for investigators who may not be familiar with the specific and complex nature of human trafficking. The protocol will emphasise the steps following identification and detection – namely the investigations as such, including gathering evidence, how to conduct interviews, cooperation with other agencies and best investigation practices from the region.

Effective investigation of human trafficking for labour exploitation in Sweden is hindered by limited law enforcement training, lack of specialised units, and insufficient use of investigative tools such as surveillance, underscoring the need for mandatory, trauma-informed training, standardised protocols, and recognition of the crime's organised and poly-criminal nature.



### 3.3.2. The benefits of specialised training and knowledge

During the course of the 5-year long CAPE project, it has also been noted that specialised anti-trafficking police units in the region, and in Europe as such, are lacking – or the anti-trafficking units are placed within broader organised crime divisions. When specialised units are in place, they have many beneficial effects. For example, the Helsinki Police Department in Finland set up a specialised anti-trafficking unit in 2021, which has positively impacted prevention efforts, victim identification, and victims' access to rights and remedies. The unit includes experts in financial crimes, violent and sexual crimes, surveillance and covert operations, and cybercrime.<sup>[47]</sup> It is responsible for large-scale cases and also supports investigations on the national level.<sup>[48]</sup> Conversely, the absence of such units results in other crimes, considered to be more important to prioritise, such as, but not limited to, narcotic-related crimes, dominating the resources allocated to prevent organised crime, systematically leaving human trafficking as a crime to be dealt with depending on time and resources.

In addition, and based on information generated through interviews and validation meetings with anti-trafficking stakeholders in Sweden, there is an unjustifiable expectation for the police organisations in Sweden, and the region, to assume a *generalist approach*. It is unrealistic to expect police officers and field investigators to possess the same level of expertise in investigating highly complex crimes like human trafficking as they do in handling more straightforward offences, such as burglary. Effective investigations can require specialised training and knowledge, especially regarding complex crimes like trafficking in human beings. When generalists are expected to be able to handle all types of cases equally well, it can negatively affect the quality of the investigation and the protection of victims.

### 3.3.3. Human trafficking as organised crime and as a poly-criminal threat

Human trafficking for forced labour and labour exploitation is a form of organised crime. However, existing ways of curbing this crime may fall short if the intertwined nature of human trafficking and organised crime is not recognised. Understanding human trafficking as an organised crime structure rather than just a case of an individual committing a crime may provide more sustainable results, as it will increase the incentive to disrupt the infrastructure enabling exploitation – given that the authorities are given clear resources, mandates and instructions to do so.

Additionally, human trafficking is a poly-criminal threat, as it overlaps with other forms of criminal activities. Human traffickers often turn to other crimes to generate profits, apart from directly exploiting a victim in human trafficking-like settings, such as labour law violations, money laundering, tax evasion, as well as benefit and financial fraud. For example, traffickers often exploit social welfare systems to launder money or supplement their illegal profits. Trafficking victims may be coerced into applying for welfare benefits that they do not receive, with traffickers pocketing the funds. Paying attention to alternative sources of criminal profit-making, such as benefit fraud, allows agencies to detect and disrupt trafficking networks by targeting their financial operations, thereby reducing the profitability of trafficking activities. It also enables using different forms of legislation to target the operations of traffickers, consequently increasing the chances of conviction.

### 3.3.4. Interviews with Swedish state authorities

Swedish state agencies interviewed within the frame of the CAPE IV project emphasised several crucial points regarding the need for enhanced training and awareness to combat trafficking in human beings. Although trainings on THB are conducted by and for state agencies, they highlighted the importance of making THB training a mandatory requirement for law enforcement personnel, prosecutors, and judges. Such training, they argued, should prioritise victim-centred approaches and incorporate trauma-sensitive methods to ensure that professionals are equipped to handle cases with empathy and a nuanced understanding of victims' experiences.

Additionally, the agencies stressed the necessity of integrating THB training into the foundational curricula of police academies and judicial education programmes. By embedding this knowledge early in professional development, they believe it can create a more consistent understanding of THB. Moreover, stakeholders raised the idea of adapting the trainings: more basic-level training on subtle THB indicators for state agencies not formally mandated to identify and counter THB, such as the Work Environment Authority. This would enable a broader range of professionals to recognise and respond effectively to signs of human trafficking, particularly in cases where the signs of exploitation are less obvious but equally harmful. Equally, the need for more in-depth and specialised trainings for law enforcement agencies was highlighted as well.

### 3.3.5. ACTIONS TO TAKE: LAW ENFORCEMENT AGENCIES & INVESTIGATIONS

- #7 — **Develop Investigation Protocols:** Develop and implement Investigation Protocols on Human Trafficking across all law enforcement agencies for consistent, effective investigations. When conducting trainings connected to the new protocol, highlight related crimes which could be applicable or occur at worksites and labour sectors identified as risk sectors of human trafficking. Incorporate protocols into the core curriculum of police academies and judicial training programmes.
- #8 — **Organise mandatory and regular law enforcement trainings:** Hold mandatory and regular trainings on human trafficking, avoiding the expectation that generalist officers can handle these complex cases. The trainings should involve the steps beyond identification, such as investigative techniques (including surveillance), victim identification, and perpetrator modus, for police, prosecutors and judges in particular. Special attention should be allocated to train border police to detect presumed human trafficking and ensure proper identification and treatment of presumed victims. The training should sensitise border police to recognise the vulnerabilities of victims, and that a presumed victim of human trafficking should be heard and treated like a victim, not deported or punished for a crime which might have taken place as a part of the ongoing exploitation.
- #9 — **Offer guidance to judges:** If it is not feasible to provide specialised training on human trafficking to sitting judges, at least provide judges with written guidance material about human trafficking.
- #10 — **Organise mixed trainings:** Hold regular trainings in mixed professional groups. A recommendation identified from the CAPE reports highlights the added value of holding joint trainings for police and prosecutors, given the close cooperation and nature of their work and process throughout an investigation.
- #11 — **Enforce the understanding of human trafficking as a form of organised crime:** Trainings for law enforcement agencies should treat human trafficking as a poly-criminal threat, recognising its deep connections with organised crime, rather than viewing it as isolated incidents to be dealt with depending on time available.
- #12 — **Train authorities without formal instructions or mandates to identify or investigate THB:** Ensure wide and basic-level trainings on THB indicators for authorities who may not have current instructions and mandates to investigate THB, to ensure increased identification of labour exploitation in worksites during inspections.
- #13 — **Allocate human trafficking-specific resources to financial crime units:** Provide dedicated resources and clear mandates for financial crime units to focus on investigating the financial networks behind human trafficking, as following the money can be very effective in court.
- #14 — **Earmark funding for anti-trafficking efforts:** Ensure to allocate funds specifically for anti-trafficking efforts, to ensure the issue is prioritised within organised crime and labour violation umbrellas, to provide sustainable support for combatting these crimes. Earmarked funding for anti-trafficking efforts is crucial as experiences from the CAPE project illustrate that THB is rarely prioritised by the Police when competing with other crimes such as narcotics or gang-related violence.
- #15 — **Train authorities to recognise benefit fraud:** Provide police, tax authorities, and social services with training to spot red flags associated with benefit fraud, such as inconsistencies in employment records or suspicious living arrangements, as benefit fraud in large-scale settings can be linked to human trafficking.

### 3.4. LABOUR INSPECTIONS

#### 3.4.1. Inspections at worksites – available tools, regulations and legislation

Labour inspectors are uniquely positioned to encounter and identify cases of labour exploitation during their inspection visits, making their role essential in addressing also human trafficking. Although perpetrators, employers and companies exploiting workers in human trafficking for forced labour and labour exploitation should be prosecuted for this crime, an effective way of disrupting criminals could also be for labour inspectors to utilise other available regulations, legislation and tools. For example, in the Netherlands and Belgium, labour inspectors can issue administrative fines if they detect labour law violations such as underpayment. This provides inspectors with a way to disrupt the operations of criminals regardless of whether it is possible to initiate a criminal investigation.

Inter-agency inspections conducted in Sweden within the frame of the A-krim efforts have so far not led to a human trafficking conviction. However, in 2024, the A-krim cooperation served as the basis for a conviction for aggravated human exploitation. This demonstrates the potential of a comprehensive, multi-agency approach to labour inspections in identifying cases of forced labour and labour exploitation.

Nevertheless, CAPE activities have highlighted challenges with the ability of Swedish labour inspectors to use different types of sanctions to deter criminals engaged in labour exploitation. For example, the inspection of wages and compliance with labour law regulations are mainly the responsibility of trade unions, which limits the ability of labour inspectors to intervene in suspected exploitative practices. At the same time, trade unions can only oversee organised workplaces, leading to a protection gap for migrant workers who are not members of unions.<sup>[49]</sup> Combining enhanced inter-agency inspections with measures to empower labour inspectors to utilise a diverse range of tools to tackle forced labour and exploitation can significantly strengthen the overall framework of labour inspections, enabling more impactful disruption of exploitative employers.

#### 3.4.2. Worksite inspections – a victim-centred approach

While different types of sanctions against companies and employers can play a part in disrupting labour exploitation, it is essential that labour inspections maintain a focus on human trafficking. This is because there is little reason to believe that presumed victims would approach state authority representatives arriving at their place of work if the victim perspective does not play a central part in the inspection approach. As highlighted in one of the CAPE reports, inspections are usually tense situations and are not conducive for victims to share the full truth about their working conditions.<sup>[50]</sup> To address this challenge, the authorities designated to function as Labour Inspectors in Belgium and Finland highlight that they see direct advantages of conducting inspections with a victim-centred focus and in few numbers, instead of conducting an inspection with 5-10 authorities at once.

Moreover, ensuring that authorities participating during inspections, such as police, are familiar with indicators of human trafficking and the actions to take

Labour inspections in Sweden are a crucial but underutilised tool in addressing human trafficking for forced labour, with current limitations in mandate, inter-agency coordination, and victim-centred approaches hindering effectiveness—though recent initiatives, such as A-krim cooperation and calls for expanded roles for the Work Environment Authority, show potential for strengthening preventive and enforcement measures.

if they suspect helps prevent cases of trafficking from being misclassified as general crimes. This approach also reduces the risk of deporting presumed victims of severe labour exploitation and ensures they receive the support and assistance to which victims of human trafficking are entitled. For example, Lithuania has implemented a pilot project where groups of labour inspectors have been tasked to specifically work with human trafficking. Other inspectors can refer suspected trafficking cases to these specialised groups for further assessment. In 2021-2022, the specialised inspectors referred seven potential cases to the police, illustrating that this can be an effective model to promote a human trafficking focus in labour inspections.

Realising comprehensively victim-centred inspections also requires considering sectors where exploitation is less visible. One example is the domestic work sector. Domestic workers, including au pairs and cleaners, often operate in isolation, far from the public eye, which makes them vulnerable to forced labour and abuse. Simultaneously, the fact that the exploitation often takes place in private homes makes it difficult to detect.

### **3.4.3. Data sharing between state agencies**

Adequate data-sharing between state agencies facilitates their ability to comprehensively address labour exploitation. Reports produced within the CAPE project emphasise that effective exchange of information among authorities is essential.<sup>[51][52]</sup> This is because inadequate communication between agencies involved in combatting human trafficking can lead to cases not being investigated and victims being unable to access support and remedies. In the Swedish context, ongoing legislative changes in this area are expected to improve the possibilities of sharing information between authorities.

### **3.4.4. The role of the Swedish Work Environment Authority in identifying trafficking and collaborating with the Police Authority**

Although the Police is the main authority responsible for investigating human trafficking, the responsibility to prevent, detect and fight this crime cannot be put as an expectation on the Police solely. No authority can effectively fight human trafficking single-handedly, nor should they. Reports written as part of the CAPE project emphasise the importance of effective inter-agency collaboration where different authorities involved in anti-trafficking work present a unified front.<sup>[53]</sup><sup>[54]</sup><sup>[55]</sup> This includes the labour authority due to its central role in identifying potential victims of human trafficking. Historically, however, the Swedish Work Environment Authority has not had a defined mandate to address forced labour and labour exploitation.<sup>[56]</sup> Clear instructions and specific assignments can enable the Work Environment Authority to adequately and in a focused manner identify, refer and prevent human trafficking for forced labour and labour exploitation.

The CAPE project activities further found that close collaboration between the police and labour authorities is a key feature of states with a successful track record in both identifying and prosecuting human trafficking, such as Belgium and Finland. In Finland, for example, labour inspectors who encounter suspected cases of exploitation are required to prepare a brief report of their findings and forward it to the police. The obligation to report suspicions of grave exploitation encourages a consistent and effective flow of information from labour inspectors to the police, promoting swift action to intervene in exploitative situations.<sup>[57]</sup>

Further cooperation specifically between the Work Environment Authority and the Police in these matters has also been highlighted by the Swedish Delegation against work-related crimes.<sup>1581</sup> The Delegation has stated that working with individuals who have little or no knowledge of Swedish labour market regulations, who do not speak Swedish or English, who may not have the right to work in Sweden, and who are often afraid of encountering authorities, differs from many of the other tasks that Swedish occupational safety inspectors typically perform. Therefore, training, experience, and special methods for dealing with this risk group may be important tools for detecting work-related crime. There is a need for competence-building and support for professionals in the field. These activities can be particularly important in enhancing the cooperation between the Work Environment Authority's inspectors, the Police Authority, and the regional coordinators against human trafficking.

### 3.4.5. Interviews with Swedish state agencies

Overall, interviewed Swedish stakeholders saw potential for the Work Environment Authority to play a more significant role in combatting labour exploitation but emphasised the need for expanded mandates or governmental instructions, better-defined responsibilities, and improved inter-agency cooperation.

A recurring theme in relation to labour inspections, especially when compared to good labour inspection practices in the CAPE project from other states, was the limitations imposed by Sweden's traditional labour model, which grants substantial regulatory authority to trade unions while restricting the mandate of labour inspectors. As a result, the Swedish Work Environment Authority cannot examine wages or working conditions in general unless tied to safety or work-hour regulations. Moreover, the authority currently holds no formal mandate or instruction from the government to address and combat THB specifically. However, it was suggested that clearer guidelines and closer cooperation with the police and other relevant authorities, also within the frame of A-krim, could enable authorities to play a more active role in preventing and addressing labour exploitation.

At the same time, Swedish state agencies have, also through the A-krim cooperation, a strong general mandate to access workplaces and conduct inspections. Stakeholders acknowledged that the focus of the work inspections conducted jointly could be focused more towards identifying and investigating THB. While the A-krim approach was described as an approach with clear potential, stakeholders emphasised the need for better coordination and planning. Inspections are sometimes conducted without clear intelligence on whether exploitation is occurring, leading to limited effectiveness. It was suggested that developing more structured inspection strategies, possibly guided by a risk-based approach, could enhance outcomes. The regional variability in how inspections are conducted and the resources available pose challenges to ensuring consistent standards across the country.

Several key state agencies identified that a victim-centred approach tends to lack in the context of workplace inspections, risking a focus on residency violations rather than identifying and addressing exploitation.

Despite these challenges, some promising aspects were raised. Such as the diverse and multi-mandated character of joint cooperation and inspection between the state agencies. For instance, the other authorities receive training from the Swedish Gender Equality Agency on recognising indicators of THB.

### 3.4.6. ACTIONS TO TAKE: LABOUR INSPECTIONS

- #16 — **Centre human trafficking in worksite inspections:** Ensure that inspections for work-related crime prioritise identifying human trafficking for forced labour. Clearly appoint actors responsible for ensuring that human trafficking is detected at workplace inspections.
- #17 — **Develop and implement risk-based inspection strategies:** Commission the A-krim agencies to develop tools and methodologies to identify high-risk employers and sectors for labour exploitation. Risk lists, developed through inter-agency intelligence sharing, should guide inspections to target workplaces where exploitation is most likely. This approach would enhance the efficiency and effectiveness of labour inspections and could be utilised throughout the country, regardless of region.
- #18 — **Evaluate existing tools and sanctions:** Compile an overview of current tools and sanctions available for Swedish authorities during inspections and evaluate their effectiveness in disrupting human trafficking operations and prosecuting exploitative employers.
- #19 — **Instruct the Work Environment Authority to work against THB:** Mandate the Swedish Work Environment Authority to contribute to the work against human trafficking, ensuring close cooperation with the Police Authority, by giving the authority formal instruction from the government.
- #20 — **Establish a procedure for reporting between the Work Environment Authority and the Police:** Commission relevant agencies to develop a template or routine that labour inspectors can use to document and report suspected cases of exploitation to the Police.
- #21 — **Ensure participation of specialised or trained police:** Ensure that police participating in inspections are specialised anti-trafficking units, or border police trained in human trafficking, to ensure a victim perspective and avoid the risk of deporting presumed victims.
- #22 — **Cooperate with municipalities and civil society:** Engage with social services in the municipalities and civil society organisations in connection to inspections when the agencies have reason to believe that victims might be identified and are in need of shelter, assistance and remedies, to ensure a coordinated and victim-centred approach.

---

## 3.5. VICTIM ASSISTANCE AND NATIONAL REFERRAL MECHANISMS

---

### 3.5.1. National Referral Mechanisms and comprehensive victim support

Activities conducted as part of the CAPE project highlighted Belgium and Finland as good practice examples of comprehensive victim assistance in human trafficking cases. Both countries provide solid support systems for victims, including access to healthcare, legal aid, and housing. Belgium, in particular, allows victims to apply for temporary residency if they cooperate with authorities and their case reaches the court, regardless of whether the case results in a conviction. This setup, according to Belgian stakeholders, effectively removes one of the main fears victims of human trafficking have in connection to cooperation with authorities: the fear of immediate deportation. This encourages more victims to come forward and cooperate with authorities. Offering legal status also allows victims to access essential services, including healthcare, housing, and employment, which are critical for their recovery and reintegration.

Belgium, identified by the CAPE project as a frontrunner state on a European level in providing support and assistance to victims of human trafficking, has a formalised National Referral Mechanism (NRM) with not only standardised steps needed to be taken to assist a victim, but also clearly defined roles and mandates for authorities and NGOs in referring and protecting victims. The Belgian NRM structure is based on three NGOs and reception centres which have the national assignment to function as shelters and service providers for victims of human trafficking. Victims are referred by immigration authorities, labour inspectors, NGOs, and social services. Counselling (psychosocial, legal, administrative) can last 3-5 years, aiming at successful integration. Legal support includes helping victims through criminal proceedings and seeking compensation. The reception centres offer shelter, emergency support and long-term assistance to victims. The NGOs are funded annually by the governmental structures, ensuring long-term and sustainable solutions to victim assistance, instead of handling each case of human trafficking on an ad-hoc basis and depending on the will, availability and resources of certain authorities.

Moreover, both Belgium and Finland provide national assistance phone numbers to victims of human trafficking, in different languages. This function allows a victim to directly get in touch with service providers instead of having to be identified by an NGO or state authority first.

### 3.5.2. Trauma-based approach training for all agencies

Findings from the CAPE project highlight that trauma affects not only victims of sexual exploitation but also those exploited for forced labour. Many victims may have deep-seated fears of authorities or fear repercussions from traffickers, making them reluctant to cooperate with investigations. Trauma-informed care helps authorities understand this reluctance and creates a more supportive environment for victims. By focusing on the long-term effects of trauma, agencies can improve the quality of care and support offered to victims, increasing their willingness to engage with law enforcement.

Victim assistance for human trafficking in Sweden remains inconsistent and heavily tied to criminal proceedings, with limited housing, uneven support across regions, and an underutilised National Referral Mechanism—highlighting the need for a more formalised, trauma-informed, and victim-centred system that ensures access to services regardless of legal status or cooperation with law enforcement.



### 3.5.3. Interviews with Swedish state agencies

Victim assistance in Sweden varies widely depending on the municipality. The larger city areas are often better equipped to provide support to victims. In contrast, smaller municipalities frequently lack resources or expertise, resulting in limited assistance. Many victims receive only basic services, such as housing, and limited access to long-term support. This inconsistency in support leaves many victims in difficult situations and often with limited incentive to cooperate with authorities in criminal investigations.

A major concern among the interviewed state agencies is that victim assistance is closely tied to the criminal justice process. If cases do not proceed or once investigations conclude, victims often find themselves without adequate support. The 30-day reflection period, which allows victims time to recover and decide on their next steps, was seen as insufficient. Furthermore, it was highlighted that the reflection period is not applied for sufficiently. Stakeholders suggested extending this period to at least 60 days to provide victims with more time to rest, reflect, and engage meaningfully with authorities. Victims without valid residence permits face even greater barriers, as their legal status often excludes them from receiving support or places them at risk of deportation if they come forward. Without long-term assistance plans tailored to labour exploitation cases, NGOs and trade unions are left to fill the gaps, often without sufficient funding or capacity. The role of NGOs and trade unions was highlighted as crucial by several Swedish state agencies interviewed, both in terms of offering housing and basic support by the NGOs, to trade unions assisting workers to retrieve unpaid salaries.

Sweden was the first country in the Baltic Sea Region to develop a National Referral Mechanism, intended to streamline and standardise the support and assistance to victims of THB for all forms of exploitation, as well as establishing new working norms on how to refer victims. Although the NRM has served as a source of inspiration, also for the CBSS in its anti-trafficking initiatives, the structure and standardised steps are not formalised and there is no obligation as such for any authority or organisation to follow the NRM, nor work in line with its standardised steps.

The Swedish manual for the NRM provides guidelines on identifying and assisting victims, but its implementation is inconsistent, according to some of the interviewed state agencies. The manual is not always clear or practical, particularly for labour exploitation cases. Stakeholders noted that while the manual describes certain rights and procedures, these are not always mirrored in the law, creating confusion and inconsistency in its application. While some authorities, such as regional coordinators, are proactive in using the manual, its usage and understanding vary widely across agencies. Victims of labour exploitation face additional challenges compared to those of sexual exploitation, as labour exploitation is in practice not always recognised as a sufficient basis for support.

The lack of a centralised national hotline for THB victims was identified as a challenge. Without such a resource, victims face difficulties in accessing information and connecting with services. Referral practices also vary throughout Sweden. In some regions, regional coordinators and NGOs play a vital role in supporting victims, but these resources are unevenly distributed, leading to disparities in the level of assistance provided. Additionally, protection measures are limited and often dependent on cooperation with law enforcement. Temporary residence permits,

for instance, are linked to the victim's willingness or ability to cooperate in investigations, leaving those unable to cooperate without viable alternatives. As there are few investigations opened, few victims are offered to cooperate, to begin with.

Housing remains another significant gap in the system. Although it is the responsibility of the social services to offer housing to exploited victims in Sweden, authorities often turn to or expect NGOs to cover this. The few safe accommodations available, such as the Salvation Army's five-bed shelter, are insufficient to meet demand. Male victims, in particular, face considerable challenges in accessing appropriate housing. For victims of labour exploitation, safe and supportive housing options remain underdeveloped, leaving many vulnerable to further harm or re-trafficking. The security aspects around housing for male victims are not always met.

Stakeholders underscored the need for a more robust, victim-centred system that separates the prospects of assistance from criminal proceedings.

### 3.5.4. ACTIONS TO TAKE: VICTIM ASSISTANCE & NAT. REFERRAL MECHANISMS

- #23 — **Formalise the National Referral Mechanism (NRM):** Consider and explore possibilities of making the NRM legally binding for relevant authorities and organisations, or at a minimum formalising it, ensuring that standardised procedures are consistently followed when assisting victims of human trafficking. Additionally, consider strengthening the labour exploitation perspective in the current NRM.
- #24 — **Extend the reflection period for victims:** Increase the current 30-day reflection period to at least 60 days, providing victims with adequate time to recover, reflect, and consider their cooperation with authorities. This extension would align with victim needs and support a more trauma-sensitive approach.
- #25 — **Expand the use of the reflection period:** Encourage investigators and social services to consistently apply for the reflection period available for victims of human trafficking, to ensure that victims receive the support they are entitled to.
- #26 — **Enhanced legal status for cooperation:** Consider introducing a system allowing victims of human trafficking to apply for permanent residence permits if they cooperate with authorities during investigations and if their case reaches the court, regardless of the perpetrator being convicted or not.
- #27 — **Provide sustainable, long-term funding:** Ensure long-term government funding for NGOs and victim support centres, guaranteeing continuous and sustainable assistance, including shelter, legal aid, and psychosocial support, rather than relying on ad-hoc funding.
- #28 — **Establish a national hotline for trafficking victims:** Create a centralised, multilingual hotline for trafficking victims to provide accessible information, support, and direct referral to services. This resource should be widely publicised and serve as a reliable entry point for victims seeking assistance.
- #29 — **Clarify the responsibility of the social services:** Consider relevant measures aimed at municipalities and social services to further establish their responsibility to assist victims of human trafficking and be aware of the actions they should take when they get into contact with victims. The National Board of Health and Welfare should develop guidelines on assistance to victims of labour trafficking.

## 3.6. ACCESS TO RIGHTS AND REMEDIES

### 3.6.1. Barriers to accessing remedies

Securing access to remedies is an essential aspect of providing adequate support to victims of human trafficking for labour exploitation. While victim support, discussed in the previous section, focuses on immediate assistance, remedies extend further to include compensation for lost wages or harm suffered as a result of exploitation. One of the reports within the framework of the CAPE project, written by the research institute HEUNI, specifically examines the ability of migrant workers in the Baltic Sea Region to access remedies if they have been subjected to labour exploitation. The report concludes that while there are many grievance mechanisms available in the Baltic Sea Region, countries lack a coherent overview of the remedy landscape, and victims of exploitation often struggle to access them in practice.<sup>[3]</sup>

This is the case also in Sweden. For example, exploited migrant workers can be reluctant to reach out to authorities due to fear of retaliation from the employer, they often lack knowledge about their rights and the processes for accessing remedies, and they may be distrustful of authorities in general. This challenge is exacerbated if the exploited migrant worker does not speak the local language or is in the country for short-term seasonal work.

To overcome these barriers, the HEUNI report highlights the importance of providing victims of human trafficking for labour exploitation with adequate assistance and support. Civil society organisations, trade unions, and victim support providers play a particularly critical role in guiding victims through the landscape of available remedies and empowering them to access compensation. Effective cooperation between non-state actors and state authorities further contributes to ensuring that victims have the knowledge, resources, and trust in the system required to engage in compensation processes. When all relevant stakeholders work together efficiently, with a clear division of responsibilities, there is a strong foundation for victims to be able to access timely and fair remedies.<sup>[4]</sup>

### 3.6.2. Flexible avenues for compensation

In addition to supporting victims of human trafficking in accessing the existing mechanisms of compensation, these mechanisms can also be designed to accommodate the diverse experiences and needs of exploited migrant workers. The HEUNI report notes that while compensation through formal court proceedings is a cornerstone of compensation processes, it can be helpful to complement it with more flexible non-judicial forums. For example, labour dispute committees in Estonia and Lithuania provide a low-threshold alternative for exploited workers who are unable or unwilling to go through formal court proceedings. These provide a much faster process of accessing compensation compared to court proceedings. In addition, the lighter administrative requirements can make them a more accessible forum for migrant workers to access, and the process poses a smaller financial risk than a civil lawsuit.

Access to remedies for victims of labour exploitation in Sweden remains limited due to legal, administrative, and practical barriers, with compensation processes often inaccessible without legal support, limited non-judicial alternatives, and few mechanisms tailored to the realities of exploited migrant workers—highlighting the need for simplified, victim-centred, and flexible approaches, including better use of existing structures, enhanced cooperation with civil society, and the development of low-threshold compensation avenues.

The system is not perfect. For example, navigating the mechanism can still be challenging unless victims receive support from NGOs or state authorities. Moreover, although an enforcement mechanism exists to address situations where employers refuse to pay compensation, it is often not utilised in practice. Regardless, labour dispute committees can serve as a useful complement to formal court proceedings, giving victims of labour exploitation flexibility in getting compensation in a way that fits their circumstances.

The HEUNI report states that state-based non-judicial compensation mechanisms are either not viewed as relevant or are perceived as inaccessible in Sweden. While there would theoretically be a possibility to submit claims about labour exploitation to different ombudsman authorities, this is currently not done in practice.<sup>[5]</sup> This highlights an opportunity to explore ways to better utilise existing structures or to develop new mechanisms that enhance access to remedies outside of judicial processes.

### **3.6.3. Victim-friendly mechanisms of state compensation**

An example of another area where adapting processes to better address the needs of victims could be beneficial is state compensation. The HEUNI report highlights Norway's Compensation for Victims of Violent Crime Act, which entered into force in 2023, as a case of good practice. This law enables victims of human trafficking to apply for compensation from the State separately from court-ordered compensation. If the victim can demonstrate an injury to their life, health, and freedom, they can receive compensation regardless of the outcome of the criminal procedure. Additionally, victims no longer need to make a separate application for compensation if the court has already ordered that they should receive compensation. As a result, the law facilitates better access to remedies by simplifying the process of applying for state compensation and expanding the eligibility for compensation.

### **3.6.4. The potential of corporate grievance mechanisms**

Remediation processes that are part of corporate grievance mechanisms cannot replace state-based compensation processes, but they can be a valuable complement to them. Corporate grievance mechanisms can be a particularly useful tool for exploited workers who lack the knowledge and resources to navigate the more complex and time-consuming state-based processes, or who do not trust the authorities sufficiently to report the exploitation. However, their success hinges on the processes being victim-centred, transparent, and responsive.

The report found that there are a few Swedish companies that report publicly that they have remediation mechanisms in place, although they do not disclose details about the content of the remediation. Currently, most such initiatives focus on supply chains in other countries, rather than exploitation that may be taking place in Sweden. They are also mainly a feature of large corporations, which have a greater danger of suffering reputational damage.<sup>[6]</sup>

### **3.6.5. Seeking compensation in Sweden**

In theory, labour migrants in Sweden seeking compensation (*skadestånd*) for exploitation have a set of alternatives, but each alternative is in practice challenging. One option is to file a civil claim against the employer through the judicial

system, typically seeking damages for unpaid wages or harm suffered due to exploitative conditions. This process, however, requires navigating a legal framework, normally with the support of legal representation that may be difficult for migrants to access due to the related costs or lack of information.

Compensation can also be sought through the *Brottsoffermyndigheten*, which provides state compensation for harm suffered as a result of criminal acts, including trafficking or labour exploitation. However, this mechanism is not uncomplicated. Applicants must first exhaust other avenues, such as civil claims or insurance, and the process itself for an exploited labour migrant can be administratively heavy. Additionally, public legal aid is not available for this process, which further limits its accessibility for many migrants.

If the exploitation leads to criminal proceedings against the employer, courts may award compensation as part of the judgment. However, this option depends on the successful prosecution of the case, which can be challenging given the high evidentiary thresholds and procedural obstacles in labour exploitation cases.

Trade unions can play a crucial role in assisting exploited workers by supporting them in filing claims in labour courts or directly negotiating with employers. However, access to trade union resources often depends on the worker's membership, and many labour migrants—especially those lacking documentation or awareness—are not part of unions. Some unions have proven successful in providing assistance to non-members, but this is not a universal practice, and awareness of these opportunities remains limited among migrants.

In addition to these mechanisms, Sweden currently lacks a structured, low-threshold alternative to formal court proceedings, such as labour dispute committees used in some other Baltic Sea Region countries. These committees provide a faster and less burdensome way for exploited workers to seek compensation, especially for those unwilling or unable to pursue judicial remedies.

### 3.6.6. ACTIONS TO TAKE: ACCESS TO RIGHTS & REMEDIES

- #30 — **Develop effective mechanisms for victims of labour trafficking to claim unpaid wages from employers:** Launch a public inquiry about how effective mechanisms should be structured.
- #31 — **Simplify access to state compensation mechanisms:** Revise the Swedish state compensation scheme to streamline the application process to *Brottsoffermyndigheten* for victims of labour exploitation. Remove the requirement to exhaust all other avenues before applying and consider providing public legal aid for compensation claims. Drawing from Norway's model enables victims to apply for state compensation independently of the outcomes of criminal or civil proceedings.
- #32 — **Enhance awareness and guidance for victims:** Increase efforts to educate victims of labour exploitation about their rights and the available mechanisms for seeking compensation. Appoint a government agency responsible for providing information to migrant workers about labour rights.

---

## 3.7. AWARENESS RAISING

---

### 3.7.1. Public campaigns – reaching migrant workers at risk of being exploited

Public awareness campaigns are an essential tool in preventing human trafficking, especially for forced labour and exploitation. A report about the exploitation of Lithuanian workers abroad written in the framework of the CAPE project notes that many migrant workers do not have sufficient knowledge of employment procedures, labour rights, and actions to take to avoid being exploited.<sup>[1]</sup> Moreover, Swedish stakeholders interviewed in a report about migrant workers' access to remedies in the Baltic Sea Region further argue that migrant workers in Sweden are often unaware of their rights due to barriers such as insufficient language skills.<sup>[2]</sup> In this context, awareness campaigns provide vital information to at-risk populations, helping them recognise exploitative practices and offering guidance on how to seek help.

One successful example is the “Before You Go” campaign, spearheaded by the Council of the Baltic Sea States and supported by the Swedish Gender Equality Agency. This campaign targeted potential victims of human trafficking, particularly migrant workers from the Baltic region, by providing clear, accessible information on labour rights, safe migration, and resources for assistance.

### 3.7.2. Targeted awareness raising and information

Another approach to awareness-raising is to target information campaigns to vulnerable migrant workers who authorities might be aware are populating a specific labour sector at a certain time, for instance, Thai workers during the berry picking season in Sweden. An excellent example of such an initiative is the collaboration between the Ministry of Labour and Social Protection of the Republic of Moldova (MoL) and the German NGO Arbeit und Leben DGB/VHS Berlin-Brandenburg (AL). In December 2021, they launched a project aimed at equipping Moldovan seasonal workers heading to work in the agricultural sector in Germany for seasonal work, with essential information about their labour rights, working conditions, and how to avoid exploitative situations.

The project was initiated under a Memorandum of Cooperation between the German Federal Employment Agency and MoL for the 2022 harvesting season. It targeted workers who were particularly vulnerable due to lack of knowledge in English and German, lack of prior experience of working abroad, and limited education. The project provided key preventive measures such as online training on German labour and social law to the staff of Moldova's National Employment Agency (NEA), legal examinations of employment contracts during the recruitment process, and the distribution of informational leaflets.

A unique aspect of the project was the creation of Viber messenger groups that allowed real-time communication between workers and support staff, providing immediate access to legal advice and guidance. Workers could also be referred to regional advisory services for further support when necessary. This proactive approach helped ensure that violations of labour rights were swiftly addressed, and recruitment for employers violating rights could be terminated.

Awareness-raising is a key component in preventing human trafficking for labour exploitation, with targeted campaigns aimed at both at-risk migrant workers and the general public helping to increase knowledge of rights, reduce vulnerability, and curb demand for exploitative labour—though Sweden could further strengthen its efforts by adopting proactive, multilingual outreach models and enhancing public understanding of ethical consumption.



The project managed to successfully reach the seasonal workers involved, providing them with ongoing support throughout their employment.

This initiative shows the importance of international cooperation between governments and organisations in preventing labour exploitation. It offers a model that can be used in other regions and industries. By giving workers clear and easy-to-understand information early in the recruitment process and continuing support during their employment, this project sets an example for raising awareness and fighting labour trafficking effectively.

Although the Swedish Government may not enter bilateral agreements with other states on labour supply for temporary and seasonal work, the example should be utilised as an illustration of offering rapid information to targeted migrant workers and groups on their rights and risks in connection to working in Sweden.

### **3.7.3. Public campaigns – reaching Swedish consumers fuelling the demand for cheap goods and services**

Although it is the responsibility of the state to prevent human trafficking for forced labour, ensure legislation that prevents human trafficking in supply chains and offer regulations and frames for fair procurement of services – the public in their capacity as consumers can make a significant difference if they are informed about the consequences of their potential consumer patterns. In recent years, the Swedish authorities involved in the inter-agency initiative against work-related crime produced a series of short films, which were published on YouTube as well as in a paid advertisement format on Swedish television channels informing Swedish consumers about the potential risks of turning to goods and services that may be *too good to be true*, and that the risk is that the consumer fuels criminal activities, unhealthy competition in the labour market and the grey economy.

### 3.7.4. ACTIONS TO TAKE: AWARENESS RAISING

- #33 — **Inform consumers about ethical consumption:** Increase efforts to educate Swedish consumers on the impact of their purchasing choices, highlighting how supporting suspiciously cheap goods and services can fuel labour exploitation and the grey economy.
- #34 — **Launch targeted campaigns for migrant workers:** Develop specific awareness campaigns for migrant workers in vulnerable sectors, such as seasonal agriculture, ensuring they know their rights and have access to resources before and during employment.
- #35 — **Clarify responsibilities for informing migrant workers:** Ensure that it is explicitly defined which authority or authorities should provide migrant workers with information about their rights.
- #36 — **Provide multilingual and multi-channel resources for migrant workers:** Offer information in multiple languages to ensure migrant workers, particularly those with limited language skills, understand their labour rights and how to avoid exploitative situations. Distribute this information through diverse physical and digital channels to ensure broad reach to different groups of migrant workers.
- #37 — **Enhance cross-border cooperation:** Promote partnerships between governments and organisations in different countries to share models for preventing labour exploitation, ensuring comprehensive support for migrant workers.

# NOTES

- [1] Sirgedienė, *The Relationship Between Recruitment Practices and Trafficking in Human Beings for Forced Labour*.
- [2] Haapasaari et al., *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*.
- [3] Haapasaari et al., *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*.
- [4] Ibid.
- [5] Ibid.
- [6] Ibid.
- [7] *Competence building, assistance provision and prosecution of labour exploitation cases in the Baltic Sea Region (CAPE)*. The project umbrella was divided into four sub-projects with focused funding and activities aimed at specific measures: CAPE I, II, III and IV.
- [8] Government Offices of Sweden. (2024). *Regeringen besökte center mot arbetslivskriminalitet*. <https://www.regeringen.se/artiklar/2024/05/regeringen-besokte-center-mot-arbetslivskriminalitet/>
- [9] Johansson, M.C. (2020). *Människohandel och människoexploatering på den svenska arbetsmarknaden*. CBSS. <https://jamstalldhetsmyndigheten.se/media/knvm3gp0/labour-exploitation-criminal-cases-overview.pdf>
- [10] United Nations Office on Drugs and Crime (UNODC). (2022). *Global report on trafficking in persons 2022*. [https://www.unodc.org/documents/data-and-analysis/glotip/2022/GLOTiP\\_2022\\_web.pdf](https://www.unodc.org/documents/data-and-analysis/glotip/2022/GLOTiP_2022_web.pdf)
- [11] Swedish Gender Equality Agency. (2024). *Regionkoordinatorernas statistik om människohandel och människoexploatering 2023*. <https://jamstalldhetsmyndigheten.se/aktuellt/publikationer/regionkoordinatorernas-statistik-om-manniskohandel-och-manniskoexploatering-2023/>
- [12] Swedish Migration Agency. (2023). *Fler fall av misstänkt människohandel identifierade 2022*. <https://www.migrationsverket.se/Om-Migrationsverket/Aktuellt/Nyhetsarkiv/Nyhetsarkiv-2023/2023-03-09-Fler-fall-av-misstankt-manniskohandel-identifierade-2022.html>
- [13] Swedish Gender Equality Agency, *Regionkoordinatorernas statistik om människohandel och människoexploatering 2023*.
- [14] Ibid.
- [15] International Labour Organization (ILO). (2022). *Curriculum on Building Modern and Effective Labour Inspection Systems, Module #16*.
- [16] Swedish Migration Agency, *Fler fall av misstänkt människohandel identifierade 2022*.
- [17] Swedish Gender Equality Agency, *Regionkoordinatorernas statistik om människohandel och människoexploatering 2023*.
- [18] Sirgedienė, R. (2020). *The Relationship Between Recruitment Practices and Trafficking in Human Beings for Forced Labour, Exploitation for Forced Labour, and Other Exploitative Labour Situations of Lithuanians Abroad*. CBSS. <https://cbss.org/wp-content/uploads/2020/11/The-Relationship-Between-Recruitment-Practices-and-Trafficking-in-Human-Beings-for-Forced-Labour-Exploitation-for-Forced-Labour-and-Other-Exploitative-Labour-Situations-of-Lithuanians-Abroad.pdf>
- [19] Ibid.
- [20] Ibid.

- [21] The Swedish Gender Equality Agency. (2023). *Ett stärkt arbete mot prostitution och människohandel*. [https://jamstalldhetsmyndigheten.se/media/ldvfuc5s/ett-starkt-arbete-mot-pom-rapport-2023\\_3.pdf](https://jamstalldhetsmyndigheten.se/media/ldvfuc5s/ett-starkt-arbete-mot-pom-rapport-2023_3.pdf).
- [22] Swedish Economic Crime Authority. (2024). *Kriminalitet på arbetsmarknaden viktig inkomstkälla för organiserad brottslighet*. <https://www.ekobrottsmyndigheten.se/arbetslivskriminalitet-viktig-inkomstkalla-for-organiserad-brottslighet/>
- [23] European Commission. (2021). *EU Strategy on Combatting Trafficking in Human Beings 2021-2025*, COM(2021) 170 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021DC0170>.
- [24] Swedish Work Environment Authority. (n.d.). *Redovisning regionala center mot arbetslivskriminalitet*. <https://www.av.se/globalassets/filer/publikationer/rapporter/redovisning-regionala-center-mot-arbetslivskriminalitet.pdf>
- [25] Johansson, M. (2024). *Human trafficking for benefit fraud and related financial fraud: Securing a steady revenue stream*. CBSS.
- [26] Swedish Gender Equality Agency, *Regionkoordinatorernas statistik om människohandel och människoexploatering 2023*.
- [27] Swedish Migration Agency, *Fler fall av misstänkt människohandel identifierade 2022*.
- [28] Swedish Work Environment Authority. (2021). *Återrapportering-regeringsuppdrag om metodutveckling för myndighetsgemensam kontroll för att motverka fusk, regelöverträdelser och brottslighet i arbetslivet*. <https://www.av.se/globalassets/filer/om-oss/vart-uppdrag/2021-02-16-aterrapportering-metodutveckling-myndighetsgemensamma-kontroller.pdf>
- [29] Regeringsbeslut: A2022/00333
- [30] Lupascu, L. (2020). *Arbeitsausbeutung, zwangsarbeit und menschenhandel in Deutschland – aktuelle herausforderungen und entwicklungen*. CBSS. [https://cbss.org/wp-content/uploads/2020/10/CAPE\\_Germanstudy\\_final.pdf](https://cbss.org/wp-content/uploads/2020/10/CAPE_Germanstudy_final.pdf)
- [31] Muraszkiwicz, J. (2020). *New discussions on the complicated relationship between Poland and forced labour*. CBSS. [https://cbss.org/wp-content/uploads/2020/09/CAPE\\_Poland.pdf](https://cbss.org/wp-content/uploads/2020/09/CAPE_Poland.pdf)
- [32] Ibid.
- [33] Ibid.
- [34] Haapasaari, S., Davis, D., Lietonen, A., Ollus, N., Jokinen, A., Pekkarinen, A. & Risberg, M. (2024). *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*. HEUNI. [https://heuni.fi/documents/47074104/49491250/HEUNI\\_Report\\_109\\_From+rights+on+paper+to+rights+in+action+WEB.pdf/7b24b8bc-bb15-11b2-9849-197e3ad9f56f/HEUNI\\_Report\\_109\\_From+rights+on+paper+to+rights+in+action+WEB.pdf?t=1731589250949](https://heuni.fi/documents/47074104/49491250/HEUNI_Report_109_From+rights+on+paper+to+rights+in+action+WEB.pdf/7b24b8bc-bb15-11b2-9849-197e3ad9f56f/HEUNI_Report_109_From+rights+on+paper+to+rights+in+action+WEB.pdf?t=1731589250949)
- [35] Ibid.
- [36] Ibid.
- [37] European Commission. (2024). *Corporate sustainability due diligence*. [https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence\\_en](https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence_en)
- [38] Johansson, *Människohandel och människoexploatering på den svenska arbetsmarknaden*.
- [39] Johansson, M.C. (2023). *Människohandel och människoexploatering på den svenska arbetsmarknaden: En uppföljning*. CBSS. [https://cbss.org/wp-content/uploads/2024/06/cape-iii-report\\_20240607.pdf](https://cbss.org/wp-content/uploads/2024/06/cape-iii-report_20240607.pdf)
- [40] Ibid.
- [41] Johansson, *Människohandel och människoexploatering på den svenska arbetsmarknaden: En uppföljning*.

- [42] Haapasaari et al., *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*.
- [43] Muraszkwicz, *New discussions on the complicated relationship between Poland and forced labour*.
- [44] Sirgedienè, *The Relationship Between Recruitment Practices and Trafficking in Human Beings for Forced Labour*.
- [45] Lupascu, *Arbeitsausbeutung, zwangsarbeit und menschenhandel in Deutschland*.
- [46] Johansson, *Människohandel och människoexploatering på den svenska arbetsmarknaden: En uppföljning*.
- [47] Group of Experts on Action against Trafficking in Human Beings. (2024). *Finland: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings*. Council of Europe. <https://rm.coe.int/greta-evaluation-report-on-finland-third-evaluation-round-focus-access/1680b0577c>
- [48] Haapasaari et al., *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*.
- [49] Haapasaari et al., *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*.
- [50] Johansson, *Människohandel och människoexploatering på den svenska arbetsmarknaden: En uppföljning*.
- [51] Muraszkwicz, *New discussions on the complicated relationship between Poland and forced labour*.
- [52] Haapasaari et al., *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*.
- [53] Sirgedienè, *The Relationship Between Recruitment Practices and Trafficking in Human Beings for Forced Labour*.
- [54] Lupascu, *Arbeitsausbeutung, zwangsarbeit und menschenhandel in Deutschland*.
- [55] Haapasaari et al., *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*.
- [56] Ibid.
- [57] Ibid.
- [58] Government Offices of Sweden. (2023). *Arbetslivskriminalitet – arbetet i Sverige: En bedömning av omfattningen, lärdomar från Danmark och Finland* (SOU 2023:8). <https://www.regeringen.se/contentassets/c9ca41d6a6d449b494d399b42bc0d7c8/arbetslivskriminalitet--arbetet-i-sverige-en-bedomning-av-omfattningen-lardomar-fran-danmark-och-finland-sou-20238.pdf>

# REFERENCES

- European Commission. (2021). *EU Strategy on Combatting Trafficking in Human Beings 2021-2025*, COM(2021) 170 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021DC0170>
- European Commission. (2024). *Corporate sustainability due diligence*. [https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence\\_en](https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence_en)
- Government Offices of Sweden. (2022). *Regeringsbeslut: A2022/00333*.
- Government Offices of Sweden. (2023). *Arbetslivskriminalitet – arbetet i Sverige: En bedömning av omfattningen, lärdomar från Danmark och Finland (SOU 2023:8)*. <https://www.regeringen.se/contentassets/c9ca41d6a6d449b494d399b42bc0d7c8/arbetslivskriminalitet--arbetet-i-sverige-en-bedomning-av-omfattningen-lardomar-fran-danmark-och-finland-sou-20238.pdf>
- Government Offices of Sweden. (2024). *Regeringen besökte center mot arbetslivskriminalitet*. <https://www.regeringen.se/artiklar/2024/05/regeringen-besokte-center-mot-arbetslivskriminalitet/>
- Group of Experts on Action against Trafficking in Human Beings. (2024). *Finland: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings*. Council of Europe. <https://rm.coe.int/greta-evaluation-report-on-finland-third-evaluation-round-focus-access/1680b0577c>
- Haapasaari, S., Davis, D., Lietonen, A., Ollus, N., Jokinen, A., Pekkarinen, A. & Risberg, M. (2024). *From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region*. HEUNI. [https://heuni.fi/documents/47074104/49491250/HEUNI\\_Report\\_109\\_From+rights+on+paper+to+rights+in+action+WEB.pdf/7b24b8bc-bb15-11b2-9849-197e3a-d9f56f/HEUNI\\_Report\\_109\\_From+rights+on+paper+to+rights+in+action+WEB.pdf?t=1731589250949](https://heuni.fi/documents/47074104/49491250/HEUNI_Report_109_From+rights+on+paper+to+rights+in+action+WEB.pdf/7b24b8bc-bb15-11b2-9849-197e3a-d9f56f/HEUNI_Report_109_From+rights+on+paper+to+rights+in+action+WEB.pdf?t=1731589250949)
- International Labour Organization (ILO). (2022). *Curriculum on Building Modern and Effective Labour Inspection Systems, Module #16*.
- Johansson, M.C. (2020). *Människohandel och människoexploatering på den svenska arbetsmarknaden*. CBSS. <https://jamstalldhetsmyndigheten.se/media/knvm3gp0/labour-exploitation-criminal-cases-overview.pdf>
- Johansson, M.C. (2023). *Människohandel och människoexploatering på den svenska arbetsmarknaden: En uppföljning*. CBSS. [https://cbss.org/wp-content/uploads/2024/06/cape-iii-report\\_20240607.pdf](https://cbss.org/wp-content/uploads/2024/06/cape-iii-report_20240607.pdf)
- Johansson, M. (2024). *Human trafficking for benefit fraud and related financial fraud: Securing a steady revenue stream*. CBSS.
- Lupascu, L. (2020). *Arbeitsausbeutung, zwangsarbeit und menschenhandel in Deutschland – aktuelle herausforderungen und entwicklungen*. CBSS. [https://cbss.org/wp-content/uploads/2020/10/CAPE\\_Germanstudy\\_final.pdf](https://cbss.org/wp-content/uploads/2020/10/CAPE_Germanstudy_final.pdf)
- Muraszkiewicz, J. (2020). *New discussions on the complicated relationship between Poland and forced labour*. CBSS. [https://cbss.org/wp-content/uploads/2020/09/CAPE\\_Poland.pdf](https://cbss.org/wp-content/uploads/2020/09/CAPE_Poland.pdf)
- Sirgedienė, R. (2020). *The Relationship Between Recruitment Practices and Trafficking in Human Beings for Forced Labour, Exploitation for Forced Labour, and Other Exploitative Labour Situations of Lithuanians Abroad*. CBSS. <https://cbss.org/wp-content/uploads/2020/11/The-Relationship-Between-Recruitment-Practices-and-Trafficking-in-Human-Beings-for-Forced-Labour-Exploitation-for-Forced-Labour-and-Other-Exploitative-Labour-Situations-of-Lithuanians-Abroad.pdf>

- Swedish Economic Crime Authority. (2024). *Kriminalitet på arbetsmarknaden viktig inkomstkälla för organiserad brottslighet*. <https://www.ekobrottsmyndigheten.se/arbetslivskriminalitet-viktig-inkomstkalla-for-organiserad-brottslighet/>
- Swedish Gender Equality Agency. (2023). *Ett stärkt arbete mot prostitution och människohandel*. [https://jamstalldhetsmyndigheten.se/media/ldvfuc5s/ett-starkt-arbete-mot-pom-rapport-2023\\_3.pdf](https://jamstalldhetsmyndigheten.se/media/ldvfuc5s/ett-starkt-arbete-mot-pom-rapport-2023_3.pdf).
- Swedish Gender Equality Agency. (2024). *Regionkoordinatorernas statistik om människohandel och människoexploatering 2023*. <https://jamstalldhetsmyndigheten.se/aktuellt/publikationer/regionkoordinatorernas-statistik-om-manniskohandel-och-manniskoexploatering-2023/>
- Swedish Migration Agency. (2023). *Fler fall av misstänkt människohandel identifierade 2022*. <https://www.migrationsverket.se/Om-Migrationsverket/Aktuellt/Nyhetsarkiv/Nyhetsarkiv-2023/2023-03-09-Fler-fall-av-misstankt-manniskohandel-identifierade-2022.html>
- Swedish Work Environment Authority. (n.d.). *Redovisning regionala center mot arbetslivskriminalitet*. <https://www.av.se/globalassets/filer/publikationer/rapporter/redovisning-regionala-center-mot-arbetslivskriminalitet.pdf>
- Swedish Work Environment Authority. (2021). *Återrapportering- regeringsuppdrag om metodutveckling för myndighetsgemensam kontroll för att motverka fusk, regelöverträdelser och brottslighet i arbetslivet*. <https://www.av.se/globalassets/filer/om-oss/vart-uppdrag/2021-02-16-aterrapportering-metodutveckling-myndighetsgemensamma-kontroller.pdf>
- United Nations Office on Drugs and Crime (UNODC). (2022). *Global report on trafficking in persons 2022*. [https://www.unodc.org/documents/data-and-analysis/glotip/2022/GLOTIP\\_2022\\_web.pdf](https://www.unodc.org/documents/data-and-analysis/glotip/2022/GLOTIP_2022_web.pdf)