

Fact sheet

Work-Related Crime, Labour Exploitation and Occupational Safety

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Integrative approaches to labor
exploitation and work-related crime:
knowledge translation, transfer and
exchange in the Nordic context



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Work-Related Crime, Labour Exploitation and Occupational Safety

What are the key concepts used?

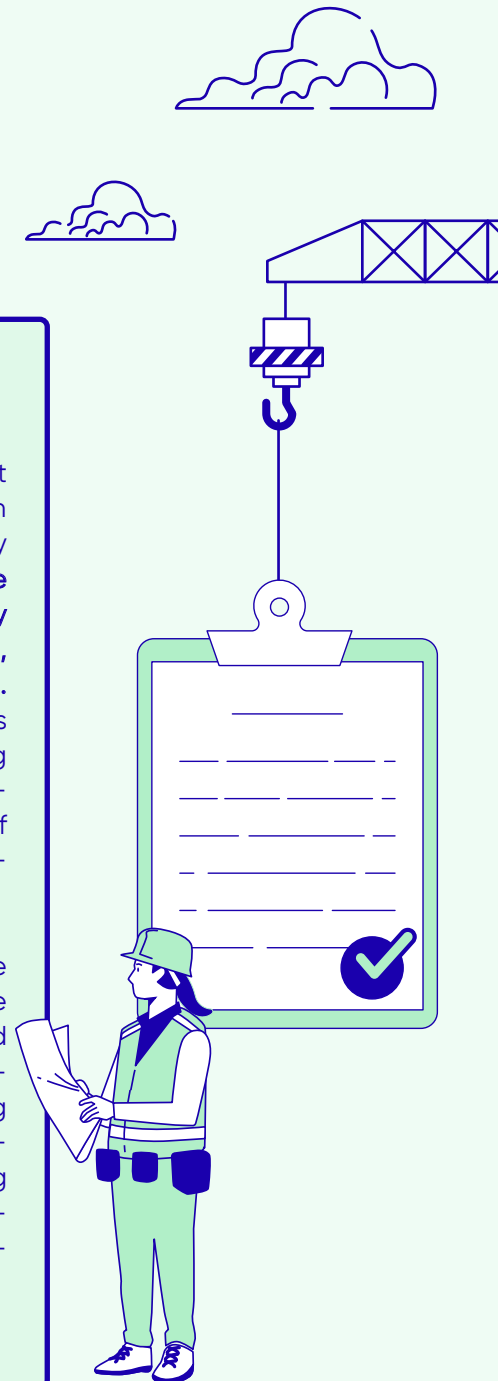
WORK-RELATED CRIME refers to violations of laws and regulations connected to employment and working life. It involves intentional actions by business owners, acting alone or with others, to violate rules or agreements in the workplace, harming employees, other businesses, or the State. This encompasses the exploitation of workers, distortion of competition and the erosion of social structures. Depending on the national legislation it may involve criminal offences such as trafficking for forced labour, human exploitation, wage-theft, extortionate work discrimination and usury in employment as well as related crimes like tax evasion, social security fraud, financial crimes, money laundering, and breaches of workplace safety regulations and labour law violations.

LABOUR EXPLOITATION refers to situations where workers are subjected to unfair, abusive or coercive practices that violate labour standards and fundamental rights. It involves excessive working hours, underpayment or non-payment of wages, unsafe working conditions, and restrictions on freedom, sometimes combined with threats, violence or debt bondage. These practices aim to maximise profit at the expense of workers' dignity, health and autonomy. The most serious forms of labour exploitation may amount to the crime of human trafficking.

What does labour exploitation look like, and how do exploitative business models operate?

LABOUR EXPLOITATION often begins with deceptive recruitment practices, where individuals are promised (well-paid) jobs within seemingly legal employment arrangements and may have to pay large sums of money for the job. **Once recruited, workers may be coerced into remaining in employment through the debt they own to their employer for getting the job, or through threats, confiscation of travel documents and other means of control.** The work may also be fully legitimate, and the workers possess appropriate work permits and work contracts, but the working conditions are exploitative, and workers do not receive the statutory salary, work overly long hours, are subject to breaches of health and safety regulations and may be controlled by the employer in ways that prevents them from leaving the job.

Labour exploitation is driven by a business model based where employers intentionally take advantage of workers to maximise profits. It typically relies on two strategies: reducing costs and generating revenue. The employer reduces costs by underpayment or non-payment of wages, demanding excessive working hours, neglecting safety standards and avoiding taxes and social contributions. Revenue generation often includes charging recruitment fees and inflating costs for essentials such as transport, housing, food and equipment, thus creating debt and dependency on the employer or exploiter.



What are the main risks for migrant workers and how is exploitation linked to the work environment?

MIGRANT WORKERS are often more vulnerable to labour exploitation due to their more precarious status and lack of information on their rights in the labour market. Migrant workers may be discriminated against, as well as subjected to unlawful practices poor and dangerous working conditions, and precarious employment, including situations of bogus self-employment where workers do not know that on paper, they are self-employed.

Occupational safety and health breaches can act as indicators of work-related crimes and exploitative working conditions. Occupational safety and health breaches can form part of an overall business model of exploitation or serve as a precursor to further violations. Work-related crime negatively impacts working conditions across different industries and usually includes the exploitation of workers.

Workers, regardless of gender or industry, face various forms of exploitation and poor working conditions marked by excessive demands and little control over their work. The excessive demands include physically strenuous tasks, fast-paced work, long shifts and few or no breaks, and limited free time, which often lead to isolation from surrounding society. Workers typically have little control or ability to influence their working conditions.

Risks differ by sector. In male-dominated industries such as transport and construction, safety risks are prevalent, often exacerbated by lack of skills and experience, lax attitudes towards safety regulations and poor language proficiency. In female-dominated sectors such as healthcare, social care, hospitality and catering, risks also include exposure to sexual harassment and violence.



What approaches do Nordic countries apply to tackle the risks?

NORDIC COUNTRIES differ in how they monitor and address the link between occupational safety, work environment risks and labour exploitation. These differences stem from the mandates, capacities, and roles of oversight bodies, particularly inspection authorities and trade unions. In Finland, labour inspectors have a mandate to monitor the terms of employment, including wages, while in Norway they have such a mandate in sectors with general extended collective agreements. In Sweden and Denmark, the work environment authorities have the mandate to only address occupational health and safety issues.

Instead, the trade unions oversee terms of employment. In Iceland, a hybrid model formalises the cooperation between trade unions and authorities to oversee working conditions. National policies and strategies toward work-related crime, occupational safety and health, and labour exploitation thus strongly influence practical approaches.

The Intergrate project

THE NORDIC COUNCIL OF MINISTERS-FUNDED INTEGRATE PROJECT (2024–2025), implemented by HEUNI in cooperation with Fafo in Norway and Lund university in Sweden, explored the links between work-related crimes, work environment risks and labour exploitation in the Nordic countries on the basis of previous literature as well as focus group discussions with labour inspectors, police representatives, trade unions and NGOs. The project produced a report and this fact sheet and checklist.

As part of the INTEGRATE project, a series of 12 short best-practice videos were produced to support inspectors, social partners and policy makers in preventing and addressing work-related crimes and work environment risks. The videos aim to highlight effective practices and joint solutions from across the Nordic countries.

Checklist

Uncovering Occupational Safety Risks Linked to Labour Exploitation

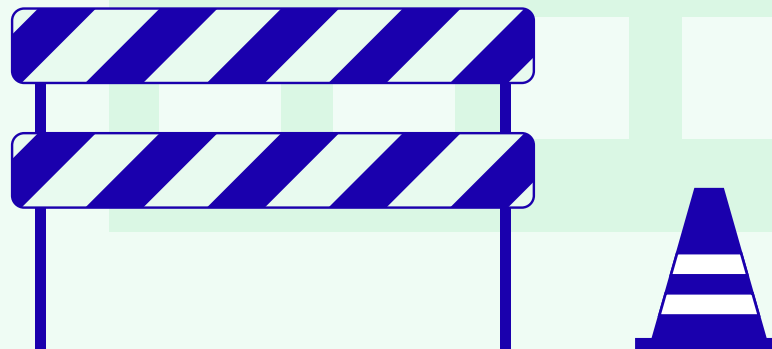
LABOUR INSPECTORS have a crucial role in safeguarding fair and safe working conditions. During inspections, they are uniquely positioned to identify breaches of occupational health and safety, as well as indicators of labour exploitation and work-related crime. Similarly, other authorities such as tax, fire safety, health, and food safety authorities as well as representatives of trade unions may also encounter situations that reveal such indicators.

Inspectors and other relevant actors, such as trade union representatives, have access to workplaces, workers and employers which provides them with the concrete opportunities to detect signs of exploitation. Inspectors and other relevant actors can also significantly contribute by informing workers about their rights and available support, including from governmental bodies, trade unions, and NGOs. They also have a role to play in ensuring that potential victims of exploitation are referred for assistance.

In addition, labour inspectors can enforce labour law by imposing sanctions on employers who commit offences or violations, which may include fines, and corrective measures. Also, other key inspection authorities (e.g., food safety and fire inspectors) may impose measures such as closure of businesses or withdrawal of licences. Recognising risks and patterns of exploitation by combining different observations is essential: individual observations may appear minor, but together they can reveal exploitative practices. The

information can be obtained through discussions with workers and employers, as well as through observations of the workers' appearance, mental status, and various aspects of workplace safety and adherence to key occupational safety and health protocols.

Even if the labour inspection authority does not have a mandate to oversee the terms of employment, all Nordic occupational safety and health agencies have the mandate to oversee general occupational safety and health conditions at workplaces. Breaches of such conditions may provide indications also of other problems at the workplace, such as underpayment and exploitation. This checklist functions as a tool to identify breaches that may be linked to labour exploitation.



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The European Institute for Crime Prevention and Control, affiliated with the United Nations



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Checklist

THIS CHECKLIST is for labour inspectors, social partners and other actors to better identify occupational safety and health breaches that may be linked to work-related crime and labour exploitation.

1 Breaches concerning workplace inductions

- ☐ **Not informing** and training workers about occupational safety and health requirements.
- ☐ **Not informing** workers about the right to workplace healthcare and where to find the statutory occupational health service provider.
- ☐ **Not giving** workers instructions regarding their work and tasks.
- ☐ **Not giving** workers instructions regarding the use of personal protective equipment (PPE), as well as the use of various machinery and tools.
- ☐ **Employing workers** who lack the required competence for the work.

2 Breaches concerning working hours

- ☐ **Overlong working** hours.
- ☐ **Lack of written** work schedules and not informing workers about their schedules in time.
- ☐ **Work schedules** do not match the real working hours which are much longer and include work during the evenings, nights and weekends.
- ☐ **Work schedules** do not match with the employees present at the workplace.
- ☐ **No access** to legally required breaks.
- ☐ **No daily** or weekly rest period.
- ☐ **No reliable** system for recording actual working hours.
- ☐ **Manipulation or falsification** of working hours records.
- ☐ **Irregular or unpredictable** scheduling.
- ☐ **On-call expectations** without compensation or rest periods.
- ☐ **Lack of days off** or holidays.

3 Breaches concerning work clothing and gear

- ☐ **Employer not providing** necessary work clothing and shoes, including for extreme temperatures (hot and cold) or specific chemicals.
- ☐ **Absence or improper** use of PPE (e.g., helmets, gloves, masks, shoes).
- ☐ **PPE not suited** to the specific hazards of the job.



Evident signals of exploitation have been uncovered for instance when work clothing is not suited to the conditions. It's very typical that a large group of suppliers or posted workers don't have winter clothes. This says something about the liquidity of the company overall, and how much it cares about its staff. Work clothes, in my opinion, are a good signal.

— Trade union representative, Finland

4 Breaches concerning employment responsibilities

- ☐ **Employers lacking** mandatory health insurance for their workers.
- ☐ **Employer not covering** healthcare costs and wage-losses due to workplace accidents.
- ☐ **Employer denying** access to healthcare.
- ☐ **Employer not providing** paid sick leave.
- ☐ **Employers returning** workers to their country of origin immediately after workplace accidents.

5 Breaches concerning safety measures

- ☐ Disregard for hazardous conditions, such as dust and asbestos management.
- ☐ Unsafe work equipment and lack of maintenance.
- ☐ Lack of instructions on how to use work equipment and tools safely.
- ☐ Equipment used beyond its safe operating limits.
- ☐ Unsafe scaffolding, ladders, or elevated work platforms.
- ☐ Slippery floors, cluttered walkways, or blocked exits.
- ☐ Unsafe transportation to the work location and use of unroadworthy cars.
- ☐ No system for reporting safety concerns or incidents.
- ☐ Retaliation against workers who report unsafe conditions.
- ☐ Safety violations not investigated or addressed.

” We’ve had a number of migrant asbestos removers who work completely without any masks or protective equipment.

– NGO representative, Finland

6 Breaches concerning employer-provided accommodation

- ☐ Signs of living in the place of work (e.g. mattresses in backroom of a restaurant).
- ☐ Poor and crowded accommodation organised by the employer.
- ☐ Lack of appropriate toilet and washing facilities, e.g. in seasonal agricultural work.
- ☐ High level of surveillance in the accommodation.
- ☐ Inflated cost of accommodation in comparison to normal rents in the area.

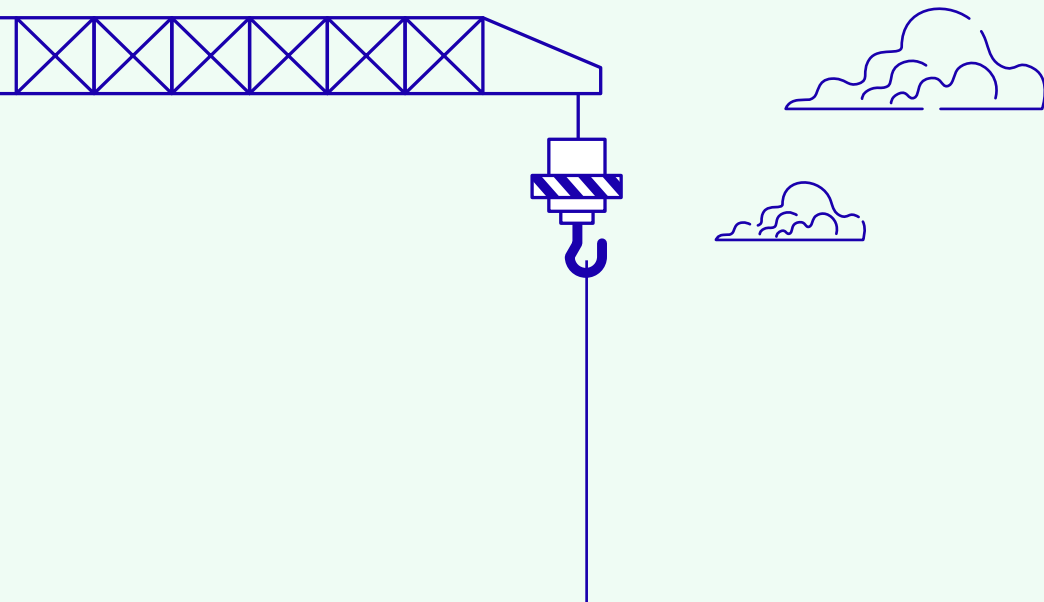
” During an inspection round I always also check the accommodation, if the workers allow me to. When I enter the basement and I can clearly see mattresses, bedclothes and a fridge or microwave or a rice cooker, well, at that point you can start asking, “So, how long are your workdays?”.

– Labour inspector, Finland

7 Breaches concerning psychosocial stress

- ☐ Signs of exhaustion, such as appearing constantly tired or struggling to concentrate.
- ☐ Anxiety or fearfulness, especially when interacting with inspectors or authorities.
- ☐ Depression or withdrawal, including lack of engagement, or social isolation.
- ☐ High irritability or emotional instability, which may manifest as sudden mood changes.
- ☐ Expressions of hopelessness or lack of control, such as statements indicating they cannot leave the job or improve their situation.
- ☐ Physical symptoms linked to stress, like headaches, stomach issues, or unexplained pain.
- ☐ Reluctance to speak freely, possibly due to fear of retaliation or surveillance by employers or their representatives.
- ☐ Signs of coercion or dependency, such as mentioning debts, withheld documents, or threats.

THESE FEATURES and observations do not necessarily point to labour exploitation as stand-alone indicators, but they showcase that various occupational safety and health breaches that involve migrant workers in risk sectors merit also further attention to broader work-related crimes and exploitative labour conditions, including human trafficking.



Additional indicators of labour exploitation include

- ☐ **Workers report** problems with their wages or are unable to say how much they are paid.
- ☐ **Workers indicate** that they have paid for the job or the work permit, or that they are required to return part of their wages to the employer.
- ☐ **Workers do not have** an employment contract, or it is in a language that they do not understand.
- ☐ **The employer** answers all questions on behalf of the workers, not allowing them to speak.
- ☐ **People are working** at the site even though the shift schedule or their general working hours indicate that they should have time off.
- ☐ **Workers' identity** documents are confiscated by their employer.
- ☐ **Workers are unaware** of the exact location of their workplace or place of accommodation.
- ☐ **Workers report** being deceived or threatened by their employer.
- ☐ **The employer** prevents/discourages workers from joining a trade union.

What should be done if signs of occupational safety and health and/or labour exploitation are uncovered?

- ☐ **Provide workers** with contact details and information on rights and support services, such as leaflets, hotline numbers and NGO or trade union cards, preferably in their own language and in various formats, so they can reach out later.
- ☐ **If you have a reason** to suspect that the workers might be victims of human trafficking, with their permission refer them to specialised support in line with national guidelines.
- ☐ **Always ensure** that migrant workers who are working without a permit are not to be deported until it has been confirmed that they are not victims of human trafficking or subjected to labour exploitation. Such workers may have a right to a reflection period or other resident permit options, or to compensation and/or payment of unpaid wages following the Employer's Sanction Directive.
- ☐ **Do not pressure** workers to speak if they appear fearful or unwilling, as they may be afraid of being overheard. Ensure a safe space when talking with the workers, ask open-ended questions and if language barriers prevent communication, arrange a phone interpreter or utilise AI-based translation tools if possible.
- ☐ **Take pictures** or videos and record breaches and report anomalies following your organisation's procedures and guidelines. If you suspect a crime, contact the police using appropriate channels or file a report of a crime. Give tipoffs to other authorities such as the labour inspectorate, police, tax authority and health and safety authorities in cases concerning poor accommodation.
- ☐ **When possible** and within the mandate of the inspection authority, impose sanctions on employers who commit offences or violations. This may include issuing corrective measures, giving fines or starting other such procedures following the national legislation and your organisations' own guidelines.

If it is a case of emergency, call 112

Tips for encounters with migrant workers who may have experienced exploitation

- ❑ **Adopt a victim-centred** approach, treat the workers with respect, observe, listen and give them time.
- ❑ **For many reasons**, it is often difficult for the exploited workers to disclose their experiences – be sensitive and establish a good rapport and ensure you can talk without other people within earshot.
- ❑ **Make sure** you and the worker understand each other, use a (trusted and neutral) interpreter, if necessary. Never use the employer or another worker as the interpreter.
- ❑ **Ask simple** and open-ended questions to establish breaches in the terms of employment, working conditions or other areas.
- ❑ **Always tell** the worker how the information gained from them will be used, how it will be handled, and what possible follow-up actions may occur.

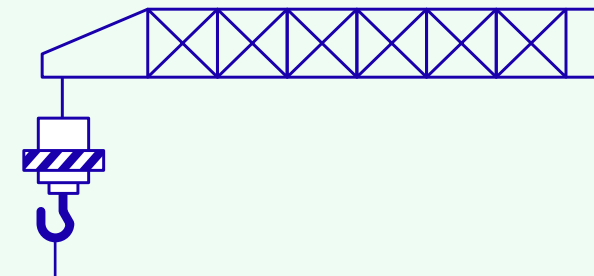
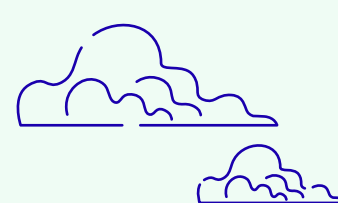
Recommended reading

REPORT SERIES N° 95a: Uncovering labour trafficking. Investigation tool for law enforcement and checklist for labour inspectors | Heuni.

POLICY BRIEF 2/31.8.2020: How to uncover labour trafficking and exploitation? The route to a successful investigation | Heuni.

POLICY BRIEF 2/2023: Trafficking in human beings: Psychological coercion and investigative interviewing | Heuni.

REPORT SERIES N°109: "From rights on paper to rights in action" – Exploited migrant workers' access to remedy in the Baltic Sea Region | Heuni.



Key national contact details

Denmark

- **Danish Working Environment Authority.** Tel. (+45) 70 12 12 88. Press 9 for English. Email: at@at.dk.
- **Hotline by the Danish Center against Human Trafficking.** Tel: +45 70202550.
- **Are you being exploited by your employer?** [Center mod Menneskehandel](#).

Finland

- **The nationwide telephone service of the OSH authorities** offers service in English on Mon, Wed and Fri 9am–12 noon. Tel: 0295 256 808.
- **Työsuojelu.fi** – [Occupational Safety and Health Administration](#).
- **National Assistance System for Victims of Trafficking hotline** 24/7. Tel: +358 295 463 177.
- **Ihmiskauppa. Website on all things related to human trafficking in Finland.**
- **Victim support Finland** – [specialised support service for victims of human trafficking](#). Email: help@riku.fi. Tel: (Mon–Fri 1–4pm): +358 40 632 9293 (also SMS or WhatsApp).

Iceland

- **The Administration of Occupational Safety and Health.** vinnueftirlit@ver.is. Tel: 550 4600.

- **Notify us | The Administration of Occupational Safety and Health.**
- **Icelandic labour law.** Vinnuréttarvefur.ASI.asi@asi.is. Tel: 53 55 600.
- **1717 Icelandic Red Cross Helpline/ Web Chat.** Tel: 1717.

Norway

- **The Norwegian Labour Inspection Authority.** Tel. +47 73 19 97 00 for questions about working environment, rights and obligations (Mon–Thu 09–11 and 12–14)
- **Submit tips on issues at the work place.**
- **National helpline** against human trafficking. Tel: +47 22 33 11 60.
- [ROSA. rosa-help.no](https://rosa.no).

Sweden

- **Work Environment authority.** Tel: 010 730 90 00. [Tips regarding risks in the work environment](#).
- **National Coordination Against Prostitution and Human Trafficking** (Advisory Service for Professionals). Tel: 020 39 00 00.
- **The Salvation Army** (Legal advice and social support in cases of human trafficking and human exploitation). Tel: 073 920 68 17. safehavens@fralsning-sarmen.se.
- **NGO Räddningsmissionen** (Social, legal, and material support regarding labour exploitation). Tel. 031 712 1200.