

Enhanced Law Enforcement Cooperation and Training on
Trafficking in Human Beings – ELECT THB



Summary of the best practices collected

Deliverable 9

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Introduction

THE AIM OF THIS task was to collect a number of best or promising practices and examples on four main themes, which at the outset of the project were identified as 1) proactive methods employed in the detection of cases of THB for sexual and labour exploitation and exchange of intelligence, 2) examples of risk assessments used to identify potential cases of THB e.g. indicator lists in use, other risk assessment tools, 3) examples of collaboration at the local, national and international levels between LEAs, prosecution services, tax authorities, labour inspectors and other key actors, and 4) best practices on the pre-processing of complaints and reports developed by different police departments in prioritising and strengthening the detection of trafficking cases.

The ELECT THB -partners were instructed to cooperate with their associated partners to collect and report relevant information from the police, prosecutors, labour inspectors and tax authorities as well as other relevant authorities and organisations when possible. Additional information and examples were also to be collected through a review of existing literature in the partners' national languages and other source materials describing best practices (e.g. reports, newspaper articles or documentaries, project descriptions, internal documents, toolkits, existing training materials/programmes, risk assessment tools, annual reports describing the activities of certain authorities, websites, strategy documents, etc. to the extent they can be accessed). Organizing additional stakeholder interviews and/or focus group meetings was encouraged if information could not be found from public sources. Moreover, if needed, the partners could identify some selected practices or key informants and then set up meetings/interviews to learn more about the practices.

Due to the confidential and sensitive nature of the information and because this is a public document, it was not possible to collect best practices focusing on the pre-processing of complaints and reports developed by different police departments. Furthermore, certain specialised techniques used by the police to collect and analyse data are referred to in more generalised terms.

Each partner followed national personal data protection rules in collecting and handling the data collected. The data collected from individual persons in interviews and or focus groups or other meetings was dealt with by guaranteeing the anonymity and confidentiality of the respondents.

It should be noted that a best practice is defined as a practice or a more elaborate intervention (such as a specific programme) that has shown some evidence of effectiveness in a particular setting and is likely to be replicable to other situations.¹ However, public practices and their impact are usually not monitored beyond basic statistical information, so it is difficult to have sufficient information to be able to say that certain practice is a best practice, rather than e.g. just a

¹ E.g. Ng, E & Colombani P. (2015): Framework for Selecting Best Practices in Public Health: A Systematic Literature Review. J Public Health Res. 2015 Nov 17; 4(3): 577. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4693338/>

promising practice. For clarity's sake, it should be noted that the practices collected for this deliverable have been deemed to have value in improving the work against human trafficking, but most have not been officially evaluated by any means. They are merely steps into the right direction and have been raised as relevant based on previous literature or in meetings with relevant stakeholders and experts.

Importantly, the partners were given the possibility of collecting practices beyond the four identified themes, which they did, as e.g. the cooperation with NGOs is of extreme importance when it comes to identifying potential victims and protecting their rights. In fact, many of the identified practices are relevant for several themes, so it was decided that when it was not possible to group the collected best practices as originally thought, they were instead simply numbered in some of the country profiles.

Each partner is ultimately responsible for their own collection of best practices and their own conclusions. The results of the work are reported below. The next two deliverables under WP2 will go deeper into summarizing the lessons learned from the work done in this task.



Finland

1. Introduction

The Finnish best practices were collected mainly through a desk review but also through participation in various meetings and other events and by contacting some experts via email to ask more details, including the associated partners. They were collected by Anniina Jokinen, Anna-Greta Pekkari and Terhi Stenholm. The materials used in the desk review included laws, policy documents, reports, articles from news media and professional publications, bulletins, and relevant websites of the key organisations involved. The practices were chosen to highlight what methods different parties (such as the police, border guard, labour inspectorate, tax authority, NGOs) employ in tackling human trafficking and exploitation. The practices also take place on different levels – some are strategic while some are very practical.

HEUNI is actively involved in the anti-trafficking work in Finland and is taking part in some of the practices and processes described below. For example, in late 2021 and early 2022 HEUNI participated the workshops organised by the Finnish Police University College related to their project on creating a joint operating model for the authorities to e.g. conduct inspection visits in collaboration with each other. Authorities from different fields and around the country got together to discuss detecting and addressing trafficking and exploitation, which was an opportunity to identify problems and good practices relevant also to the ELECT THB project (see practice 9 for more details). The collaboration model developed on the basis of this work will be launched in June 2022.

Furthermore, HEUNI staff members participate in different networks and working groups related to human trafficking and exploitation in which different practices have been introduced and discussed in detail. However, confidential information has not been included in the best practices presented below since this is a public document. This does limit the extent to which some issues related to e.g. investigations and police procedures could be discussed. It was not possible to group the collected practices in a rigid manner as several practices described below relate to more than one theme. Therefore, the practices are numbered, but not grouped under separate sub-headings.

2. Best practices collected

Name	Best practice 1: National human trafficking investigation unit of the Finnish police
Short summary of the practice – What has been	In the beginning of 2021, the Finnish police established a special unit for investigation of human trafficking cases within the Helsinki police

done, by whom, when and how? Impact?	<p>department. The establishment was part of the Governmental programme by Prime Minister Sanna Marin.</p> <p>The unit consist of two Detective Superintendents and 17 investigators, and they investigate large-scale, international and otherwise demanding trafficking cases and help uncover cases. They investigate all forms of trafficking. One of the Detective Superintendents is in charge of the investigations on trafficking for sexual exploitation while the other is in charge of labour trafficking investigations. (HS 17.1.2022.)</p> <p>In addition, the National Bureau of Investigation received funding to appoint three persons to do analytical work in maintaining a picture on the trafficking situation and trends in Finland as well as to be in charge of international cooperation. (Ibid.)</p> <p>The group also does proactive work in uncovering potential trafficking cases. The proactive work of the group has focused on uncovering cases of sexual exploitation in the first year, and this has consisted of e.g. going through different online sites which publish adds for sexual services. (HS 17.1.2022; YLE 23.3.2021.)</p>
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	Collaboration with stakeholders such as the labour inspectors, tax authorities, border guards and other authorities is important especially in relation to labour trafficking. In addition, cooperation with the national assistance system for victims of trafficking as well with NGOs is important and helps the group to uncover and investigate trafficking cases and refer victims to assistance. (HS 17.1.2022; YLE 23.3.2021.)
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	The results of the national unit after one year show the importance of specialisation in investigation of trafficking. Securing sufficient evidence of trafficking usually requires a lot of work and takes time.
Sustainability and transferability Is the practice sustainable on the longer run? Could	Yes, establishment of a specialised trafficking unit of the police is recommended to all European countries.

it work in another region or country?	
Resources and further reading	<p>Helsingin Sanomat 17.1.2022. Ihmiskauppaa kitkemässä. [Tackling human trafficking] by Kantola Anne. https://www.hs.fi/kaupunki/art-2000008501524.html</p> <p>Yle. 23.3.2021. Poliisin uusi erikoisryhmä tutkii ihmiskauppaa ja paritusta – myös lainsäädäntöön on tulossa muutoksia, jotta uhreja voidaan auttaa paremmin [New special unit of the Police investigates human trafficking and pimping – changes in legislation also underway to better help victims] by Jäärni Clarissa. https://yle.fi/uutiset/3-11846474</p>

Name	Best practice 2: Role of the Finnish Border Guard in investigating THB
Short summary of the practice – What has been done, by whom, when and how? Impact?	<p>The mandate of the Finnish Border Guard was expanded in 2005 and since then the Border Guard has been a pre-trial investigation authority alongside the Police and Customs (Rajamme Vartijat 2021, 5). The role of the Border Guard in crime prevention is governed by the Act on Crime Prevention by the Border Guard (108/2018).</p> <p>The Finnish Board Guard can investigate potential cases of trafficking in human beings in situations that involve (suspected) illegal entry, and it is a core part of the Border Guard's border control and related criminal investigation activity (Roth & Luhtasaari 2021, 28). Methods of risk analysis are employed to detect potential victims of human trafficking when examining entry and departure requirements (Ministry of the Interior 2018). The Border Guard is able to use coercive measures such as traffic data monitoring, covert intelligence gathering or telecommunications interception if there are reasonable grounds to suspect a person of involvement in aggravated facilitation of illegal entry and related trafficking in human beings (or regarding some measures, aggravated trafficking in human beings) (Act 108/2018, Sections 16, 23, 58).</p> <p>Improving the ability to tackle human trafficking by developing legislation and improving the Border Guard's capacity to identify and uncover cases of human trafficking is included in the Border Guard's Performance plan 2022 and Action and financial plan for 2023–2025 (The Finnish Border Guard 17.12.2021).</p>
Geographical scope Where the practice is implemented	<p>National</p> <p>In Finland, most cases of suspected illegal entry are uncovered by the Border Guard either in Helsinki-Vantaa airport or at the border of Finland and Russia (Aamulehti 25.10.2019).</p>
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange	<p>The Finnish Border Guard cooperates with other authorities and organisations and directs potential trafficking victims to the Assistance system for victims of trafficking. The Border Guard also cooperates internationally i.a. in matters of THB with agencies such as Frontex and Europol. (Ministry of the Interior 2018.) Furthermore, the Border Guard has done human trafficking and smuggling -related work in countries of</p>

data/tips etc.? How does the cooperation function in practice?	origin/transit. For example, Finnish Border Guard officers have been stationed as liaisons in Nigeria, Russia, Estonia, and China. (Yle 10.7.2017.)
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>The Border Guard has investigated cases related to both human trafficking for labour exploitation as well as for sexual exploitation (e.g. Helsingin Sanomat/STT 8.3.2012; Helsingin Uutiset 10.2.2017).</p> <p>The Border Guard's ability to only investigate trafficking cases in conjunction with illegal entry is a potential limitation of the practice. One of the measures in the Finnish Action Plan against THB, directed towards the Ministry of the Interior, is to examine the possibility to extend the Border Guard's powers on investigating human trafficking (Roth & Luhtasaari 2021, 61).</p>
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	The Border Guard works in points of entry and thus may be able to detect and investigate cases in which suspicion arises of foul play in the motives or circumstances in which a person is entering the country.
Resources and further reading	<p>Aamulehti. 25.10.2019. Suomessa tutkitaan vuosittain kymmeniä ihmissalakuljetustapauksia – Asiantuntija: ihmiskauppa on kansainväliseen huumekauppaan verrattava bisnes. [Dozens of human smuggling cases investigated in Finland each year. Expert: human trafficking is a business comparable to international drug trafficking] by Toivonen Hannu. https://www.aamulehti.fi/uutiset/art-2000007419381.html</p> <p>Act on Crime Prevention by the Border Guard. 108/2018. https://www.finlex.fi/fi/laki/kaannokset/2018/en20180108</p> <p>Helsingin Sanomat/STT. 8.3.2012. Rajavartiolaitos epäilee siivousfirmaa ihmiskaupasta. [Border Guard suspects cleaning company of human trafficking] https://www.hs.fi/kotimaa/art-2000002522815.html</p> <p>Helsingin Uutiset 10.2.2017. Rajavartiolaitos paljasti törkeän ihmiskaupan – Matka Nigeriasta Vantaalle maksoi naiselle 15 000 euroa. [Border Guard reveals aggravated trafficking in human beings] https://www.helsinginuutiset.fi/paikalliset/1553834</p> <p>Ministry of the Interior/Sisäministeriö 2018. Border Guard Department. 12.9.2018 Lausunto Eduskunnan hallintovaliokunnalle: Yhdenvertaisuusvaltuutetun kertomus eduskunnalle 2018 (K 6/2018 vp). [Statement on The Report of the Non-Discrimination Ombudsman to the Parliament 2018]. https://www.eduskunta.fi/FI/vaski/JulkaisuMetatieto/Documents/EDK-2018-AK-203319.pdf</p> <p>Rajamme Vartijat 2021. 3/2021, Rikostorjunta mukautuu</p>

	<p>toimintaympäristön mukaan [Crime prevention changes based on the operating environment] by Kettunen Kari. https://raja.fi/documents/44957406/52056402/3_21_Rajamme-Vartijat-saavutettava.pdf</p> <p>Roth Venla & Luhtasaari Mia. 2021. Finland fights human trafficking. Action Plan against Trafficking in Human Beings. Publications of the Ministry of Justice, Memorandums and statements 2021:24. Helsinki: Ministry of Justice. http://urn.fi/URN:ISBN:978-952-259-824-0</p> <p>The Finnish Border Guard/Rajavartiolaitos. 17.12.2021. Rajavartiolaitoksen tulossuunnitelma 2022 sekä toiminta- ja taloussuunnitelma 2023 - 2025 [The Border Guard's Performance plan 2022 and Action and financial plan for 2023-2025]. https://raja.fi/documents/44957406/64377821/RVL_TS2022_TTS2023_2026.pdf/</p> <p>Yle Uutiset. 10.7.2017. Tehtävä border guard fights Nigeriassa: suomalainen rajavartija taistelee ihmiskauppaa vastaan – "Tämä on 2000-luvun orjakauppaa" [Mission in Nigeria: Finnish against human trafficking – "This is 21st century slave trade"] by Peiponen Pasi. https://yle.fi/uutiset/3-9712836</p>
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Name	Best practice 3: Specialised labour inspectors focusing on the use of migrant labour
<p>Short summary of the practice – What has been done, by whom, when and how? Impact?</p>	<p>Labour inspectors are key authorities in prevention of labour exploitation and trafficking. They work in the Divisions for OSH of the Regional State Administrative Agencies and operate under the administrative sector of the Ministry of Social Affairs and Health. Labour inspectors monitor employers' compliance of e.g. the Employment Contracts Act (55/2001), the Working Time Act (872/2019), the Occupational Safety And Health Act (738/2002), Act of Posting Workers (447/2016), and in part, the Aliens Act (301/2004) (Työsuojelu.fi 2022).</p> <p>Labour inspectors' enforcement activities are based on the Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces (44/2006). The Act guarantees the access to information and inspection rights that the inspectors need in order to carry out their enforcement activities – e.g. the access to any place where work is performed, the access to relevant documents, and the possibility to talk to workers (with the help of interpreters, if needed).</p> <p>In total, 29 labour inspectors are specialized in enforcing the rights of migrant workers. The number of migrant inspectors was significantly increased with 13 new inspectors in the areas of responsibility with the help of an additional appropriation granted by Parliament in 2021. (Nupponen 2022.) These migrant inspectors focus on ensuring that the employers fulfil their legal obligations, that workers are not exploited, and that the terms of employment follow the law.</p>

	<p>Inspections are usually carried out without prior notice (in cases where prior notice is likely to interfere with achieving the objectives of the inspection (Act 44/2006, Section 8)), and they are often based on tips received from other authorities, organisations or private persons. Labour inspectors also cooperate closely with pre-trial investigation authorities (i.e. the police and border guard) (Koskenoja et al. 2018, 178–179).</p> <p>The inspectors have a duty to report to the police if they uncover employment offences of the Criminal Code (39/1889, Ch. 47), including extortionate work discrimination and work discrimination, or trafficking in human beings (Ibid. Ch. 25: 3, 3a). Labour inspectors also have a separate guideline outlining their duty to refer suspected victims of trafficking to the National assistance system for victims of trafficking (Pekkarinen et al. 2021, 18).</p>
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	Regional State Administrative Agency monitors the employment of foreign nationals in Finland in cooperation with the police and the tax administration.
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>In 2020, the labour inspectors of the Regional State Administrative Agency of Southern Finland completed 343 inspections, of which 170 were carried out as document inspections (instead of inspection visits). Due to the COVID-10 pandemic, the number of inspections was much lower than in 2019 (786 inspections) and a bigger share of the inspections was performed as document inspections. Although the number of inspections was low in 2020, the number of tips related to the use of migrant labour increased by 15% compared to the previous year. Most of the tips concerned the construction industry. (Grey economy & economic crime 2021.)</p> <p>In 2020, labour inspectors in Southern Finland reported migrant workers without a work permit in every other inspection in the construction sector; in every fourth inspection in the cleaning sector; and in every fifth inspection in the hospitality sector. In addition, payment/salary issues were discovered in 65 % of the construction sector and 86 % of the restaurant sector inspection visits. Insufficient records of working hours were also found in almost 80 % of the restaurant inspections. During the last years, inspections have been focused on sites where employers have had shortcomings in following labour law: the high numbers of migrant workers discovered without a work permit shows, on one hand, that the targeting of inspections has been successful. On the other hand, in e.g. the</p>

	<p>construction sector, working without a permit has become more common. (Grey economy & economic crime 2021.)</p> <p>Labour inspectors have a limited ability to inspect domestic work, as they can carry out inspections within private households only if there is reasonable cause to suspect that work performed there causes danger to an employee's life or a serious harm or hazard to their health (Act 44/2006, Section 9). Currently, a suspicion on trafficking in human beings may not be enough to allow for an inspection within the domestic sphere (Roth & Luhtasaari 2021, 23).</p> <p>The mobility between countries has decreased because of COVID-19, but the situation of victims already in Finland has become even worse as contacts to the world have decreased and exploitation has changed its form (Pekkarinen et al. 2021, 18).</p>
<p>Sustainability and transferability</p> <p>Is the practice sustainable on the longer run? Could it work in another region or country?</p>	<p>41 % of all migrant labour inspections in Finland were conducted in Southern Finland, and nearly 70 % of the locations where migrant workers without a work permit were discovered, were situated in Southern Finland (Grey economy & economic crime 2021). This at least to an extent reflects the fact that the densely populated Helsinki metropolitan area, and many of the risk sector jobs are located in Southern Finland.</p>
<p>Resources and further reading</p>	<p>Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006. https://www.finlex.fi/en/laki/kaannokset/2006/en20060044_20060701.pdf</p> <p>The Criminal Code of Finland (39/1889). https://www.finlex.fi/fi/laki/kaannokset/1889/en18890039_20150766.pdf</p> <p>Grey economy & economic crime/Harmaa talous & talousrikollisuus 2021. Aluehallintovirasto valvoo ulkomaalaisten työntekoa Suomessa [Regional State Administrative Agency monitors migrants' work in Finland]. https://www.vero.fi/harmaa-talous-rikollisuus/torjunta/torjuntatilastot/ty%C3%B6nantajat-ja-tilaajavastuu/#Aluehallintovirasto Updated 30.3.2021; read 8.2.2022.</p> <p>Jokinen Anniina & Ollus Natalia. 2014. "Tuulikaapissa on Tulijoita": Työperäinen ihmiskauppa ja ulkomaalaisten työntekijöiden hyväksikäyttö ravintola- ja siivouspalveluilla. HEUNI Publication Series No. 76. Helsinki: HEUNI. https://heuni.fi/-/reports-series-no.-76</p> <p>Koskenoja Maija, Ollus Natalia, Roth Venla, Viuhko Minna & Turkia Laura. 2018. Tuntematon tulevaisuus: selvitys ihmiskaupan uhrien auttamista koskevan lainsäädännön toimivuudesta. Valtioneuvoston selvitys- ja tutkimustoiminnan julkaisusarja 24/2018. Helsinki: Valtioneuvoston kanslia. https://julkaisut.valtioneuvosto.fi/handle/10024/160696</p> <p>Ministry of Social Affairs and Health/Sosiaali- ja terveysministeriö 2021. Työsuojelelun valvontaan esitetään useita parannuksia. Tiedote 136/2021, 20.5.2021. [Many improvements proposed for labour inspectors'</p>

	<p>enforcement] https://stm.fi/-/tyosuojelun-valvontaan-esitetaan-useita-parannuksia</p> <p>Nupponen Tarja 2022. Statistics on the number of inspectors. Information received in personal communication from Ministry of Social Affairs and Health, Ministerial Adviser Tarja Nupponen 18 February 2022.</p> <p>Pekkarinen Anna-Greta, Jokinen Anniina, Rantala Annareetta, Ollus Natalia & Näsi Roosa. 2021. Selvitys ulkomaisen työvoiman hyväksikäytön torjunnan menettelyistä eri maissa. Työ- ja elinkeinoministeriön julkaisuja Työelämä 2021:55. Helsinki: TEM. https://heuni.fi/-/selvitys-ulkomaisen-tyovoiman-hyvakskayton-torjunnan-menettelyista-eri-maissa</p> <p>Roth Venla & Luhtasaari Mia. 2021. Finland fights human trafficking. Action Plan against Trafficking in Human Beings. Publications of the Ministry of Justice, Memorandums and statements 2021:24. Helsinki: Ministry of Justice. http://urn.fi/URN:ISBN:978-952-259-824-0</p> <p>Työsuojelu.fi. 2022. Ajantasainen työsuojelulainsäädäntö [Current OSH legislation]. Updated 12.1.2022; read 8.2.2022. https://www.tyosuojelu.fi/tietoa-meista/toiminta/lainsaadanto</p>
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Name	Best practice 4: National Action Plan against Trafficking in Human Beings
<p>Short summary of the practice – What has been done, by whom, when and how? Impact?</p>	<p>In 2021, the new Finnish National Action Plan against Trafficking in Human Beings was launched. The plan was developed by an intersectoral working group coordinated by the Ministry of Justice. During the preparations civil society organisations, experts and multi professional networks were consulted and workshops were organised to gain a comprehensive picture of the challenges in the work against human trafficking in Finland and to collect recommendations for concrete actions to be taken. The plan will be implemented in 2021–2023. An external assessment of the implementation of the action plan will also be carried out. (Roth & Luhtasaari 2021.)</p> <p>The National Action Plan is based on 55 actions and five strategic objectives which aims to enhance the establishment of criminal liability, promote detection of human trafficking, and improve the position of victims. The goal for Finland is to remove obstacles to the detection of human trafficking by developing legislation and official practices. The plan will also intensify cooperation with civil society and strengthen the activities of antitrafficking wider for the Government. (Roth & Luhtasaari 2021, 51–52.)</p> <p>The goal is to achieve a nationwide and comprehensive situational picture of human trafficking crime for the pre-trial investigation authorities to identify all forms of human trafficking which makes it possible to aim effective criminal liability to prevent these crimes. Approach is phenomenon-based with a holistically view to assess the essential elements of the offence considering the legal safeguards of both the suspect and defendant providing victims the assistance they need. To ensure criminal liability in these offences the aim is to strengthen competence and intensify cooperation between the pre-trial investigation</p>

	<p>authorities, prosecution authorities as well as the supervisory authorities. (Ibid., 59-60.)</p> <p>The aim of the action plan is also to examine the possibility to amend Criminal Investigation Act to be able to head possible victims in the future to the investigators specialised in human trafficking as well as examine other legislative development needs according to the activities and power regulations of the authorities. This will include also a review of expanding the powers of the Finnish Border Guard as it comes to investigate human trafficking offences. (Ibid., 45, 61.)</p> <p>The lack of resources for the authorities makes it difficult to tackle human trafficking in an effective manner. The plan highlighted the training needs of prosecutors as well as the need for specialized prosecutors, so that the totality situations of victims would be examined holistically, and the investigation would not focus only on isolated offences. To meet this need, the National Prosecution Authority has set up a network of specialised prosecutors in human trafficking. To improve the enforcement of access to justice, co-operation between pre-trial authorities and prosecutors during pre-trial investigations will be improved. (Ibid., 38, 45, 59.)</p> <p>Moreover, strengthening the detection of human trafficking has been included as a cross cutting theme under the new national action plan for preventing illegal entry and residence (2021-2024) under the leadership of the Ministry of the Interior. The aim of the action plan is to strengthen the ability of different authorities to identify victims of trafficking and other forms of exploitation and increase the efficiency of victims' access to justice. (Ibid., 45.)</p>
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	All key authorities and the anti-trafficking NGO's as well as Assistance System for victims of human trafficking are involved in implementing the program to achieve higher quality and greater efficiency to identify and process all forms of human trafficking in the criminal justice process.
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>Limitations: The working group is concerned about sufficient resources of courts and the prosecution authorities as well as the complexity of the rules on penalties and difficulties to apply those in practice. The essential elements of the crime include factors that are difficult to prove and interpret. The access to justice is hampered by the long duration of criminal proceedings and considerable differences in the skills and work organization of those involved in criminal proceedings. (Ibid., 29.)</p>

	<p>During the consultations the pre-trial investigation authorities felt that human trafficking offenses are demanding and laborious to investigate. E.g. in the view of the working group the authorities lack sufficient awareness of how the purpose of sexual exploitation looks like in Finland. According to the experts, the detection of this form of human trafficking is nearly wholly dependent on the resources allocated to the investigations and intelligence-gathering. The uncovering activities of the pre-trial investigation authorities is needed, and identification skills were seen as key to initiating these investigations. The possibility of human trafficking is not always considered at the beginning of the pre-trial investigation due to lack of expertise. Cooperation between authorities is also not yet part of the authority structures, which makes it so far more difficult to detect labour related trafficking. (Ibid., 22, 29, 38.)</p>
<p>Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?</p>	<p>The sustainability of the practice has been ensured by making all the different actors accountable for their own actions, which helps to maintain the sense that each actor's role is equally important and thus encourages co-operation and participation in the fight against trafficking in human beings. The plan also aims to strengthen structural approach in addressing human trafficking, so that the implementation of various activities does not solely rely on individual officials but are rather part of the organisations' priorities.</p>
<p>Resources and further reading</p>	<p>Roth Venla & Luhtasaari Mia (2021) Finland fights human trafficking – Action Plan against Trafficking in Human Beings, Publications of the Ministry of Justice 2021:24 https://julkaisut.valtioneuvosto.fi/handle/10024/163326</p>

Name	Best practice 5: Grey Economy Information Unit of the Finnish Tax Administration: compliance reports and proactive risk profiling
<p>Short summary of the practice – What has been done, by whom, when and how? Impact?</p>	<p>Since 2011, the Finnish Tax Administration has had a dedicated Grey Economy Information Unit which studies the phenomenon of grey economy and its impacts and publishes analyses and research articles that also touches upon topics such as labour exploitation and trafficking in a wider context. The Unit has for example published a report on underpayment of wages, which analysed convictions of extortionate work discrimination of migrant workers. (Hautala 2020.)</p> <p>The Grey Economy Information Unit prepares compliance reports and customer classifications to help the other authorities involved in the fight against the grey economy e.g. to focus their efforts in the right places and to work in a proactive manner. The unit has access to different registries of the tax administration and other authorities and can conduct proactive risk profiling for example in certain risk sectors and look at a large number of businesses or even focus on analysing one selected business. They can provide information on the company registration, taxes paid, financial statements, key figures and look for signs of e.g. non- or underpayment of</p>

	wages, tax fraud or other signs of the grey economy using the available information. The services of the Information Unit are free for responsible authorities. (Vero 2022.)
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>The Grey Economy Information Unit collaborates closely with stakeholders such as the labour inspectors, police, and other relevant authorities who have the right to ask for compliance reports.</p> <p>The compliance reports produced by the Unit bring together current registry information concerning a certain company or companies using data from various authorities. The report includes updated and compiled information of key regulatory information e.g. information on operations, finances, and the fulfilment of obligations for taxes as well as statutory pension, accident and unemployment insurance contributions and charges levied by the Finnish Customs. The information in the report is generally generated by what is reported by the subject itself. Moreover, the compliance report can include e.g. employee information from the Finnish Tax Administration, pension payment information from the Finnish Centre for Pensions and customs information from the Finnish Customs. In addition, the report includes information on execution fees and information on the bankruptcy and reorganization stages. The authorities that have the right to order compliance reports do so using an online interface. (Vero 2022.)</p> <p>In addition, the Unit cooperates for example with the Finnish Competition and Consumer Authority, in a joint project where staff in charge of public procurement were trained to identify unscrupulous partners. In addition, the Unit cooperates with banks and has also provided their staff training on combating grey economy. (Vero 2022.)</p>
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>The compliance reports produced by the Grey Economy Information Unit help the authorities to target and implement inspections based on available information.</p> <p>In 2020, the Tax Administration conducted a total of 547 grey economy inspections, which resulted in 21,4 million EUR in VAT to be paid and 19 million EUR on employer's contributions to be paid. The selection of the target companies was done on the basis of risk profiling, which succeeded very well as 90 % of the inspections made on the basis of risk profiling uncovered unpaid tax contributions. (Vero 2022.)</p> <p>Since 2016, the number of compliance reports conducted by the Grey Economy Information Unit has increased significantly. In 2020, a total of 628 070 compliance reports concerning organisations were produced as well as 146 585 reports concerning individuals. In 2021, a total of 427 522 compliance reports concerning organisations were produced as well as 280 042 reports concerning individuals. The decrease in 2021 was due to the COVID-19 pandemic. (Vero 2022.)</p>

<p>Sustainability and transferability</p> <p>Is the practice sustainable on the longer run? Could it work in another region or country?</p>	<p>Yes, the specialisation and risk profiling allow scarce resources to be used effectively.</p> <p>The Grey Economy Information Unit functions on the basis of a law (1207/2010) which defines its tasks and duties. https://www.finlex.fi/fi/laki/ajantasa/2010/20101207</p> <p>All exchange of information between authorities is based on legislation.</p>
<p>Resources and further reading</p>	<p>Harmaa talous & talousrikollisuus [Grey economy & economic crime] 2022. Viranomaiset [Authorities]. https://www.vero.fi/en/grey-economy-crime/about-this-website/authorities/</p> <p>Hautala Matti. 2020. Ulkomaalaisten alipalkkaus harmaan talouden ilmiönä Suomessa – oikeustapaanalyysi. [Underpayment of migrants as a phenomenon of the grey economy in Finland]. Selvitys 5/2020. Helsinki: Verohallinto, Harmaan talouden selvitysyksikkö. https://www.vero.fi/globalassets/harmaa-talous-ja-talousrikollisuus/selvitykset/2020_05-ulkomaalaisten-alipalkkaus-harmaan-talouden-ilmi%C3%B6n%C3%A4.pdf</p> <p>Laki harmaan talouden selvitysyksiköstä 1207/2010 [Act on Grey Economy Information Unit] https://www.finlex.fi/fi/laki/ajantasa/2010/20101207</p> <p>Vero [Tax Administration] 2022. https://www.vero.fi/harmaa-talous-rikollisuus/torjunta/torjuntatilastot/verotus/</p>

Name	Best practice 6: Labour inspectors specialised in monitoring contractors' liability
<p>Short summary of the practice –</p> <p>What has been done, by whom, when and how? Impact?</p>	<p>The Finnish Occupational Safety and Health Administration under the Regional State Administrative Agency of Southern Finland employs a total of 25 labour inspectors who are specialised in monitoring the contractors' obligations and liability in all regions of the country² The inspectors focus on ensuring that subcontractors and temporary employment contractors fulfil their legal obligations following the Act on the Contractor's Obligations and Liability when Work is Contracted Out. (1233/2006).</p> <p>The Act concerns all industries that use subcontracting or temporary labour, and it aims to promote fair competition and to ensure that all contractors ensure that their sub-contractors fulfill their legal obligations. They must check and collect the following documents:</p> <ol style="list-style-type: none"> 1. Information on whether the contracting partner is entered in the Prepayment Register and Employer Register, and registered as VAT-liable in the Value Added Tax Register 2. Extract from the Trade Register or equivalent information otherwise obtained from the trade register 3. Report on tax payment status 4. Certificates of pension insurance taken out and of pension insurance premiums paid, or an account that a payment

² OSH Administration in Finland 2019

	<p>agreement on outstanding pension insurance premiums has been made</p> <ol style="list-style-type: none"> 5. Account of the collective agreement or principal terms of employment applicable to the work 6. Account of the organisation of occupational health care services 7. Certificates indicating that insurance has been taken out (in association with construction contracts) (OSH Administration in Finland 2021, 2-3.) <p>The information must always be obtained from contracted companies, including foreign companies. The collected documents must be retained for at least two years after the work has been done. Each main contractor is responsible for obtaining information on its own sub-contractors. (OSH Administration in Finland 2022a.)</p> <p>If the contractors have not made the checks and collected the documents, the inspectors have the right to order them to pay a special fine which is 2110-21100 EUR. In addition, the contractor may be required to pay an increased fine if it has entered into an agreement with a company or a person who is under a business ban. (OSH Administration in Finland 2021, 5.)</p> <p>If a foreign contracting party sends posted workers to Finland, the contractor must find out to which country is responsible for the employees' social security before the work starts. This can be verified from an A1 Certificate which shows which country's social security laws and payments apply to the employee.³ In construction sector, the main contractor must ensure that workers are covered by an accident insurance. (Ministry of Economic Affairs and Employment of Finland 2022.) A foreign employer must provide health care services according to the Finnish legislation for the posted workers and the contractor must ensure that the services are provided in Finland. The contractor must ensure that all received information relating this matter is understood. (OSH Administration in Finland 2022b.)</p>
<p>Geographical scope Where the practice is implemented</p>	<p>The practice is national. The Regional State Administrative Agency of Southern Finland is in charge of monitoring the implementation of the law throughout the country.</p>
<p>Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?</p>	<p>The specialised contractor's liability inspectors cooperate closely with the Finnish Tax Administration Finland, in particular with the Grey Economy Information Unit which drafts compliance reports which are used to target inspections to high-risk companies. If criminal activities are uncovered during inspections, they will be reported to the police. The inspectors also cooperate closely with the Finnish Centre of Pensions.</p> <p>Pre-COVID19-pandemic, the inspectors have also made joint inspections with tax authorities and the officials from the Finnish Pensions Centre and other authorities (Regional State Administrative Agency 2020).</p> <p>The practice is based on law.</p>

³ Finnish Centre for Pensions 2022

<p>Effectiveness</p> <p>Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?</p>	<p>The Regional State Administrative Agency of Southern Finland completed nearly 800 contractor's liability inspections in 2020, of which 744 inspections were completed on March 1st, 2021. These concerned a total of about 2 700 contractual partners. In only 130 inspections everything was in order, of these 88 concerned companies in the construction sector. More than 1200 advices were issued, of which most were given to foreign contractors. Moreover, a negligence fee/fine was considered in 52 instances. In four cases it was noted that the main contractor has had to know that their sub-contractor has not fulfilled its statutory obligations. Each of these cases concerned one or more foreign contractors and they often included underpayment of wages and/or under-pricing. (Regional State Administrative Agency 2021.)</p> <p>The Regional State Administrative Agency notes that although awareness of contractor's liability in the construction sector is better compared other industries, there are still shortcomings in compliance with the minimum legal requirements, especially in long subcontracting chains. Inspections have revealed that the number of foreign self-employed individuals has slightly increased in subcontracting chains. It is sometimes not possible to determine whether it is a case of real self-employment or "bogus self-employment". In a bogus self-employment situation, the person might not know about their status and the obligations it causes. In the worst case, it might be linked to labour trafficking or exploitation. (Ibid.)</p> <p>In 2019, a total of 1600 inspections were made and more information from other authorities was used in the supervision. A total of nearly 18 000 compliance reports were requested from the Grey Economy Information Unit in order to target inspections made in 2019. The inspection visits were also carried out together with the Tax Administration and the Finnish Center for Pension and other authorities. (Regional State Administrative Agency 2020.) The COVID-19 pandemic hindered the inspections in 2020 as on-site inspections could not be carried out as in previous years. Therefore, the use of existing registry data and intelligence was of high importance in targeting the inspections. In particular, the data of contracts and employees for construction as well as the compliance reports were widely used for this purpose. In addition, since the beginning of 2020 the OSH Authority has received real-time data from the national income register. The use of risk profiling data and existing registry data made it possible to focus the inspections on companies which use subcontracts and temporary employment contracts as risks are more likely there. (Regional State Administrative Agency 2020.)</p>
<p>Sustainability and transferability</p> <p>Is the practice sustainable on the longer run? Could it work in another region or country?</p>	<p>Yes, this specialisation is considered very useful in ensuring that contractors fulfill their obligations when work is contracted out.</p>
<p>Resources and further reading</p>	<p>The Act on the Contractor's Obligations and Liability when Work is Contracted Out (1233/2006). [Laki tilaajan selvitysvollisuudesta ja vastuusta ulkopuolista työvoimaa käytettäessä]. https://www.finlex.fi/fi/laki/ajantasa/2006/20061233</p>

	<p>Finnish Centre for Pensions/Eläketurvakeskus 2022. What is an A1 certificate. https://www.etk.fi/en/work-and-pensions-abroad/insurance-while-working-abroad/what-is-an-a1-certificate/</p> <p>Ministry of Economic Affairs and Employment of Finland/TEM 2022. Tilaajavastuulla tuetaan työehtojen noudattamista. https://tem.fi/tilaajavastuu</p> <p>OSH Administration in Finland 2021. Act on the Contractor's Obligations and Liability when Work is Contracted Out. Act on the Contractor's Obligations and Liability when Work is Contracted Out Publications of the OSH Administration in Finland 1/2017 (updated 9/2021) (tyosuojelu.fi)</p> <p>OSH Administration in Finland/Työsuojelu 2022a. Tilaajavastuu [Contractor's obligations and liability]. https://www.tyosuojelu.fi/harmaa-talous/tilaajavastuu</p> <p>OSH Administration in Finland/Työsuojelu 2022b. Sopimus ulkomaisen yrityksen kanssa [Agreement with a foreign company]. https://www.tyosuojelu.fi/harmaa-talous/tilaajavastuu/sopimus-ulkomaisen-yrityksen-kanssa</p> <p>Regional State Administrative Agency 2020. Tiedote 20.5.2020. https://avi.fi/tiedote/-/tiedote/69887930</p> <p>Regional State Administrative Agency 2021. Employers and contractor's obligations. https://www.vero.fi/en/grey-economy-crime/prevention/preventionstatistics/employers-and-contractors-obligations/</p>
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Name	Best practice 7: Strategy and Action plan for tackling the grey economy and economic crime
<p>Short summary of the practice - What has been done, by whom, when and how? Impact?</p>	<p>The cross-governmental Strategy is comprised of four main priority areas which are: 1) promoting healthy competition between companies and a fair labour market; 2) preventing grey economy and economic crime; 3) ensuring the ability of authorities to combat the grey economy and economic crime; and 4) developing measures to combat the grey economy and economic crime and improving cooperation between authorities. Each main priority is addressed in the form of projects in the Action plan. (Finnish Government 2020, 2, 12.)</p> <p>The projects related to labour exploitation/trafficking include, e.g.</p> <ul style="list-style-type: none"> - study on the methods of preventing the exploitation of migrant labour in different countries (see Pekkarinen et al. 2021). - examining new means, such as administrative sanctions, to intervene in intentional or grossly negligent underpayment. - extending the tax number system used in the construction industry to shipbuilding and assessing its need in other sectors such as tourism and the restaurant sector. - enhancing the effectiveness of supervision and other actions of different authorities through e.g. joint action and standardized

	<p>operating models of cooperation. (Finnish Government 2020, 8, 15, 45; TEM 2020.)</p> <p>Each project has been assigned to a responsible party (listed below in the section "stakeholder collaboration"). The first plan was done in 1996 and the current one for 2020–2023 is the eight one in a row (Grey economy & economic crime 2022).</p> <p>A steering group for tackling the grey economy led by the Minister of Employment oversees the implementation of the strategy and the action plan (Finnish Government 2020, 11).</p>
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>The Action plan lists one or more parties responsible for each of its projects. These parties include: the Ministry of Economic Affairs and Employment, the Ministry of Justice, the Ministry of Social Affairs and Health, the Ministry of Transport and Communications, the Ministry of Finance, the Ministry of the Interior, the Ministry of Agriculture and Forestry, the Ministry for Foreign Affairs, Tax Administration, National Bureau of Investigation, police departments, National Police Board of Finland, Customs, Finnish Competition and Consumer Authority, National Administrative Office for Enforcement, Office of Bankruptcy Ombudsman, and National Prosecution Authority. (Finnish Government 2020.)</p>
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>The steering group for tackling the grey economy did a mid-term review and concluded that the Action plan's projects have proceeded as planned and scheduled; many have already been completed (TEM 2022).</p> <p>The Action plan is amendable, if needed: in September 2020 the steering group for tackling the grey economy and economic crime decided that four new projects related to efforts against migrant labour exploitation were to be added to the current plan (TEM 2020). Recently, a project was initiated to model the multi-authority cooperation of trafficking investigations, and a working group will be set up to prepare a long-term strategy and action plan to tackle and prevent the exploitation of migrant labour (TEM 2022).</p> <p>Results of the projects related to the previous plan – "Action Plan against the Shadow Economy and Economic Crime for 2016–2020" can be found here: https://www.vero.fi/en/grey-economy-crime/prevention/torjuntaohjelma/action-plan-against-the-shadow-economy-and-economic-crime-for-20162020/</p>
Sustainability and transferability Is the practice sustainable on the longer run? Could it	<p>There is funding for the implementation of the Strategy and the Action plan, and additional appropriation has been set aside for e.g. the enforcement authorities and tax administration to combat the grey economy and financial crime (Finnish Government 2020, 3). A sound financial backing and budgeting will increase the sustainability of the action.</p>

work in another region or country?	<p>EUR 200 000 is reserved for commissioning impact assessments of the Strategy and the Action plan. The implementation and impacts of the Strategy can be monitored e.g. by evaluating the impacts of legislative changes and the authorities' actions, and by preparing reports on individual phenomena as well as surveys targeted at businesses. (Finnish Government 2020, 12.)</p> <p>The current Action plan is the eight one in a row, so they have proven sustainable. A similar strategy and an action plan could be created in any country if the local ministries and other stakeholders are willing to commit to it and the associated projects.</p>
Resources and further reading	<p>Finnish Government 2020. Government resolution on a strategy and an action plan for tackling the grey economy and economic crime for 2020–2023: https://valtioneuvosto.fi/documents/1410877/16402203/Government+Resolution+on+a+Strategy+and+an+Action+Plan+for+Tackling+the+Grey+Economy+and+Economic+Crime+for+2020%E2%80%932023/ba2282cd-449f-f2de-a449-9c8d15b0de36/Government+Resolution+on+a+Strategy+and+an+Action+Plan+for+Tackling+the+Grey+Economy+and+Economic+Crime+for+2020%E2%80%932023.pdf</p> <p>Grey economy & economic crime/Harmaa talous & talousrikollisuus 2022. Strategy and Action plan for tackling the grey economy and economic crime. Site updated 3.2.2022. https://www.vero.fi/harmaa-talous-rikollisuus/torjunta/torjuntaohjelma/</p> <p>TEM/Ministry of Economic Affairs and Employment of Finland. 21.9.2020. Täydennyksiä harmaan talouden ja talousrikollisuuden toimenpideohjelmaan. [Amendments to the Action plan for tackling the grey economy and economic crime]. https://tem.fi/-/taydennyksia-harmaan-talouden-ja-talousrikollisuuden-toimenpideohjelmaan</p> <p>TEM/Ministry of Economic Affairs and Employment of Finland. 25.1.2022. Harmaan talouden torjuntaohjelma etenee suunnitellusti [The Action plan for tackling the grey economy is proceeding as planned] https://tem.fi/-/harmaan-talouden-torjuntaohjelma-etenee-suunnitellusti</p>

Name	Best practice 8: Strengthening exchange of information and intelligence among authorities
<p>Short summary of the practice – What has been done, by whom, when and how? Impact?</p>	<p>To tackle labour exploitation more efficiently through cooperation between authorities and other actors, it is important to be able to recognize the gaps and needs in information-/intelligence-sharing.</p> <p>The researchers of the Finnish Police University College recently finished a report on the blind spots of information sharing and analysis in multi-authority cooperation related to the control of labour migration. According to the report, cooperation and the exchange of intelligence between the authorities is a key element in tackling labour exploitation. Based on the findings of a survey targeted at different authorities, the report argues that</p>

	<p>the current legislation on authorities' exchange of information is broad and partially open to interpretation, which is likely to hinder information sharing. Furthermore, the survey respondents called for a network structure for sharing information/intelligence. This kind of approach would help maintain information even when individual key officers leave the organisation. The report also envisaged a centralized analysis function to which different authorities could submit their observations, as well as a multi-authority registry for information related to human trafficking. (Kuukasjärvi et al. 2021, 65–67.)</p> <p>A report by the Migration Institute of Finland (Raunio et al. 2022) examined information gaps and support needs of the authorities that handle work-based residence permits (Finnish Immigration Service; TE/Employment Office; the Centre for Economic Development, Transport and the Environment; and diplomatic missions) and enforce the Aliens Act (Police, Border Guard, Regional State Administrative Agency) in relation to identifying and tackling labour exploitation. A survey was circulated among these authorities (n=81) and 30 percent of the respondents agreed with the statement that multi-authority cooperation and information-sharing with other organisations works well in preventing labour exploitation, while 42 percent disagreed with it (Ibid., 26). The report highlights the need for more information on the phenomenon, and the development of resources and cooperation between the authorities. This would entail e.g. making information-sharing more structural, clarifying the duties and limitations related to it, and using digital platforms to both source and share information (Ibid., 26, 59–60).</p> <p>HEUNI's report (2021) for the Ministry of Economic Affairs and Employment also recommended strengthening the structural cooperation between key actors based on successful examples from e.g. Norway and the UK. Effective multi-agency cooperation requires shared principles and sufficient resources to avoid the risk of each actor working in their own silos. The recommendations include, i.e., creating an action plan to tackle labour exploitation (incl. concrete actions regarding information-sharing, mandates and regional cooperation), piloting a model of shared premises for different authorities, and designating officers from different organisations to specifically work against labour exploitation. (Pekkarinen et al. 2021.)</p>
Geographical scope Where the practice is implemented	Local, regional and national
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation	The police, the prosecutor, labour inspectors, tax authorities, the border guard, the assistance system for victims of trafficking – to some extent also other actors such as NGOs who work on the topic.

function in practice?	
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	Functional and effective examples from different countries show that structural cooperation in information-sharing as well as other activities can yield positive results.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	Country-specific or regional aspects (laws, different authorities and their mandates etc.) should be taken into consideration at the planning stage.
Resources and further reading	<p>Kuukasjärvi, Kimmo, Rikkilä Saana & Kankaanranta Terhi. 2021. Selvitys tietojenvaihdon ja analyysitoiminnan katvealueista työperäisen maahanmuuton valvonnan moniviranomaisyhteistyössä. Poliisiammattikorkeakoulun raportteja 139. Tampere: Poliisiammattikorkeakoulu. https://urn.fi/URN:NBN:fi-fe2021110954521</p> <p>Pekkarinen Anna-Greta, Jokinen Anniina, Rantala Annareetta, Ollus Natalia & Näsi Roosa. 2021. Selvitys ulkomaisen työvoiman hyväksikäytön torjunnan menettelyistä eri maissa [Report on the methods of preventing the exploitation of migrant labour in different countries]. Työ- ja elinkeinoministeriön julkaisuja Työelämä 2021:55. Helsinki: TEM. https://heuni.fi/-/selvitys-ulkomaisen-tyovoiman-hyvaaksikayton-torjunnan-menettelyista-eri-maissa</p> <p>Raunio Mika, Ahvenainen Toni & Vanhanen Sari (Siirtolaisuusinstituutti / Migration Institute of Finland). 2022. Ulkomaisen työvoiman hyväksikäytön ehkäisy: Viranomaistyön tuen tarpeet ja tietokatveet [Preventing the exploitation of foreign labour: Support needs and knowledge gaps of the authorities]. Työ- ja elinkeinoministeriön julkaisuja 2022:2. Helsinki: TEM. http://urn.fi/URN:ISBN:978-952-327-967-4</p>

Name	Best practice 9: Creating an operating model to support the systematic management of multi-authority control activities
Short summary of the practice – What has been done, by whom, when and how? Impact?	The Finnish Police University College is undertaking a project funded by the Ministry of the Interior in which they create a joint operating model for the authorities. The aim is to tackle human trafficking and labour exploitation more efficiently through cooperation between authorities and other actors by sharing information and exchanging intelligence on the target of the control. The original impetus for the project was a successful 2019 pilot of control visits to berry farms in Eastern Finland (Tuovinen 2021; see also Ylinen et al. 2020, 18).

	<p>To develop of the model, the project team organised two sets of three regional workshops with the authorities in late 2021 and early 2022 to discuss labour exploitation, and current and potential practices in multi-agency cooperation. More than 60 people in total took part in workshops, including representatives from the police, border guard, labour inspectorate, tax authority, prosecutor's office, rescue department, employment office – and in the Helsinki area, a few national stakeholders (listed below in "stakeholder collaboration"). In the first phase, the participants gathered to talk about e.g. obstacles and barriers, but also good practices and lessons learned in cooperation and tackling labour exploitation. In the second phase, another set of three workshops was organised in early 2022 to discuss and add to the operating model draft that had been created. The model will be further developed based on these workshops and finalized within the upcoming months.</p> <p>The project is based on the idea that cooperation and the exchange of intelligence between the authorities are key elements in tackling labour exploitation, trafficking and grey economy. The selection of the target of intelligence as well as the inspection visits are based on information provided by several authorities. A potential multi-agency control event may stem from planned joint inspections, thematic inspections or a need for inspections identified by an individual authority. All actors relevant to the goal of the inspection are involved in the planning.</p> <p>The collaboration model is also applicable to other co-operation between authorities. The framework of this model also considers and enables the involvement of the 3rd sector in the different stages of the model, if necessary.</p> <p>The model is based on the following three steps:</p> <ul style="list-style-type: none"> • <u>Planning</u>: the planning meeting may be convened by any authority that has identified the need for inspections. The meeting will address the competencies and mandates of each authority which are relevant to the practice. • <u>Implementation</u>: the principal authority coordinates and is responsible for leading the inspection. Each authority involved informs the others of the findings and the action taken. • <u>Feedback & follow-up</u>: all parties involved the inspection participate and share their experiences. If necessary, a representative of the prosecutor's office will also be invited. Joint follow-up measures will be decided. (POLAMK workshops 2021–2022.) <p>The exchange of information is a particularly important part of the independent action of individual authorities in order to set aside sufficient resources for joint inspections.</p> <p>In cases of exploitation of migrant labour and suspicions of trafficking, a so-called fast-track model should be set up, in which the labour inspector, the police and the prosecutor act quickly to hear those involved. (Ibid.)</p>
Geographical scope	The practice is national, but it considers Finland's regional differences while making it possible to create uniform procedures.

Where the practice is implemented	
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>Co-operation between the police, border guard, labour inspectors (of the Regional State Administrative Agency), tax authorities, prosecutor's office, rescue departments, employment offices, the Center for Economic Development, Transport and the Environment, the Finnish Immigration Service, the Finnish Food Authority, the Finnish Food Safety Authority, and the Finnish Transport and Communications Agency.</p> <p>Co-operation is based on the obligations in the legislation, but above all, on the desire to promote the action of authorities on their own initiative, while increasing the understanding of legality and the efficient use of public finances.</p>
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>The structures of the collaborative model are applicable and contribute directly to other contexts between public authorities (and when relevant, the 3rd sector).</p> <p>A point of discussion in the workshops and something worth considering in planning such a practice is whether a multi-authority electronic platform that could be used in the operations exists or should be developed. As regards to the common platform, challenges have been identified in this maintenance, which would require a cross-administrative agreement.</p> <p>The interpretation of the legislation may pose a challenge, regarding the disclosure of information – e.g. in some cases the spontaneous disclosure of information may be prohibited, even if another authority is entitled to receive it. Information can often only be shared on request, but the authority needs to know what information is needed and by whom.</p>
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	<p>Country-specific or regional aspects (laws, different authorities and their mandates etc.) should be taken into consideration at the planning stage. In combating labour trafficking it is essential for all parties involved to understand the phenomenon, and its current and regional characteristics.</p> <p>Functional and effective examples from different countries (e.g. Norway, UK) show that structural cooperation in information-sharing as well as other activities can yield positive results (Pekkarinen et al. 2021).</p> <p>Several projects related to authorities' work against labour exploitation are taking place in Finland which are likely to enhance each other's impact. Another project will soon commence, in which a model of the pre-trial investigation will be created for the operative and tactical use of the police (Tuovinen 2021).</p>
Resources and further reading	<p>Poliisiammattikorkeakoulu. Moniviranomaistoiminnan suunnitelmallista johtamista tukevien toimintamallien luominen poliisille [Project page of the Finnish Police University College]. https://polamk.fi/moniviranomaistoiminnan-suunnitelmallista-johtamista-tukevien-toimintamallien-luominen-poliisille</p> <p>POLAMK workshops 2021-2022. (1-18 Nov 2021 and 24-27 Jan 2022)</p>

	<p>Tuovinen, Juha. 22.11.2021. Moniviranomaisyhteistyö vahvistaa työperäisen hyväksikäytön torjuntaa. https://www.vero.fi/harmaitalous-rikollisuus/torjunta/ajankohtaista/#harmaantaloudentorjunta</p> <p>Ylinen Pekka, Jokinen Anniina, Pekkarinen Anna-Greta, Ollus Natalia, Jenu Katja-Pia & Skur Thomas. 2020. Uncovering labour trafficking. Investigation tool for law enforcement and checklist for labour inspectors. HEUNI Publication Series No. 95a. Helsinki: HEUNI. https://heuni.fi/-/report-series-no.-95a</p> <p>Pekkarinen, Anna-Greta, Jokinen Anniina, Rantala Annareetta Rantala, Ollus Natalia & Näsi Roosa. 2021. Selvitys ulkomaisen työvoiman hyväksikäytön torjunnan menettelyistä eri maissa. Työ- ja elinkeinoministeriön julkaisuja Työelämä 2021:55. Helsinki: TEM. https://heuni.fi/-/selvitys-ulkomaisen-tyovoiman-hyvakskayton-torjunnan-menettelyista-eri-maissa</p>
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Name	Best practice 10: Mapping the risks of managing the obligations with the use of migrant labour
<p>Short summary of the practice – What has been done, by whom, when and how? Impact?</p>	<p>In 2021, the Grey Economy Information Unit conducted a mapping where it examined the risks of the use of migrant labour associated with companies with limited tax liability, including the risks of the grey economy, debt management and tax behaviour. The mapping was based on information collected between 2015 and 2019 obtained from the Finnish Tax Administration and the Finnish Immigration Service. The study examined the differences between 12,177 employees and more than 13,000 companies that paid their wages. Most of the companies were domiciled in Finland but they differed from the average Finnish companies, e.g., in terms of size, industry, location, life cycle and management of obligations. Almost half of the foreign companies were registered in the construction sector. (Tax Administration Finland 2021, 1, 40; Vero 2021.)</p> <p>Persons living abroad have limited tax liability and pay tax in Finland only on income received from Finland. The mapping focused on analysing the possibility of a seamless integration of data between the Tax Administration Finland and the data received from the Finnish Immigration Service. By combining and cross-referencing this information it is possible to detect employers' negligence, such as work-related exploitation regarding underpayment of those who have obtained a Finnish work permit. Pooling this information would help all authorities to monitor the activities of companies and help ensure the rights and obligations of migrant workers. It would also support pre-trial investigations and facilitate inspections. The investigation identified what changes should be made to correct the matter if the necessary information could not be obtained from the data. (Tax Administration Finland 2021, 1; Vero 2021.)</p> <p>The prevention of grey economy and economic crime has long focused on problems in information exchange between the authorities. Some structural shortcomings were observed during the mapping. The removal of these problems would lead to a significant improvement in the wider use of databases or registries by public authorities. Combining databases would result in an improved registry, working e.g. as a reliable source of</p>

	<p>information in making the fight against labour exploitation and underpayment more effective; in monitoring residence conditions based on work permits; and in investigation follow-up. (Tax Administration Finland 2021, 1; Vero 2021.)</p> <p>Since 1 September 2020 the act on the processing of personal data by migration authorities entered into force. It ensures a wide access to official information for the migration authorities in conducting their duties. In addition, from 1 March 2021, they were provided with the opportunity to use the service of the Tax Administration's Grey Economy Information Unit and the compliance reports it produces. (Vero 2021.)</p>
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>The stakeholders involved are the Finnish Tax Administration and the Finnish Immigration Service.</p> <p>According to the mapping, collecting salary data from the Finnish Immigration Service's database and comparing them with the Tax Administration's data was challenging. In work permit applications, there were several different versions of the grounds for determining wages, gaps in the identification data, and salary amounts were presented in several different currencies. Due to different payroll and reporting methods, it was unfortunately not possible to identify underpayment or indications of work-related exploitation in the data in a reliable manner. (Tax Administration Finland 2021, 1.)</p> <p>Due the lack of registry data, some companies and individuals remained unidentified. There were more than 23,500 lines of data with incomplete personal identification data, and no personal identification was found in more than 1,660 lines. Part of this work could be automated by comparing different data sources using algorithms. (Tax Administration Finland 2021, 10.)</p>
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>Companies that paid salaries to employers with limited tax liability were collected from the Tax Administration's annual data and income register. The employment relationships of these employees were short-term, nine out of 10 of these salary periods were 1 to 3 months long. More than 90 percent of these were Finnish companies, and they were located in Southern Finland.</p> <p>The investigation identified companies whose employees had been granted a work permit in 2019, but in 10 % of the cases there was no wage data available. In addition, there were companies for which no information on their turnover was found, despite positive work permit decisions. From a total of 17,769 positive work permits, 11,633 of the persons had "disappeared and could not be associated with the business ID". In addition, there were 10,577 cases of work permit applications that were combined with another business ID than the one marked in application, and 4,258 persons who had a positive work permit but were "undeclared"</p>

	<p>i.e. had no data in the Tax Administration. (Tax Administration Finland 2021, 42.)</p> <p>Limitations: It was impossible to calculate the financial profitability, indebtedness, and liquidity of several of the companies due to incomplete financial statements. The UMA4 data format used by the Finnish Immigration Service did not allow for a seamless integration of data with the income register in the Tax Administration. There are several thousand people in the country whose employment cannot be controlled because they are not identified and cannot be associated with companies when the Business ID is not used in the work permit applications. (Tax Administration Finland 2021, 38, 42.)</p>
<p>Sustainability and transferability</p> <p>Is the practice sustainable on the longer run? Could it work in another region or country?</p>	<p>Combining such data would enable better risk profiling of potential labour exploitation cases nationally. Similar practice could be utilised also in other countries.</p>
<p>References and further reading</p>	<p>Tax Administration Finland 2021, The Grey Economy Information Unit. https://www.vero.fi/globalassets/harmaa-talous-ja-talousrikollisuus/laajuus/kuvat-videot-ja-tiedostot/2021_04-ulkomaisen-ty%C3%B6voiman-k%C3%A4ytt%C3%B6%C3%B6n-liittyv%C3%A4t-velvoitteidenhoidon-riskit.pdf</p> <p>Vero 2021. Grey economy & economic crime, Risks associated with the use of foreign workforce investigated, 25.10.2021. https://www.vero.fi/en/grey-economy-crime/scope/studies-on-the-shadow-economy/</p>

Name	Best practice 11: Proactive practise of the Helsinki police department in uncovering trafficking cases in the sex industry
<p>Short summary of the practice – What has been done, by whom, when and how? Impact?</p>	<p>Detective Kenneth Eriksson has developed proactive work of the Helsinki police department in uncovering cases of trafficking for sexual exploitation. His work and techniques have been discussed publicly in various media articles as well as his autobiography from 2020. The practice is based on building trust between persons involved in prostitution and erotic services industry and establishing dialogue between the police and persons who are selling sexual services. Building trust is of vital importance because many persons selling sexual services are afraid of the authorities and hesitate to report any crimes, they may have subjected to for example because of fear of deportation⁴. (Yle 2.1.2021)</p>

⁴ According to the Finnish Aliens Act, Chapter 9, Section 148: “An alien may be admittance or stay if: there are reasonable grounds if there are reasonable grounds to suspect that he or she may sell sexual services. In these cases, a decision on refusal an entry ban may be imposed on an alien. An entry ban is imposed for a fixed term of no more than five years or until further notice.

	<p>Thanks to good relationships and trust, regular visits and extensive work in the field during late evening and nights, Eriksson's team is aware what is happening in the field. Moreover, potential victims and other persons have been able and confident enough to reach out to Kenneth Eriksson and seek assistance, as well as inform him if they have encountered vulnerable persons e.g. people who may have violent pimps, young and inexperienced looking persons, or persons who might have been forced into prostitution. This has also allowed the police to spot newcomers in the field and to establish contacts with them. (Eriksson & Björkqvist 2020; Reinikainen 2021.)</p> <p>Eriksson has been open and confident in his working style e.g., his official telephone number is widely known among persons selling sexual services but also among criminals and other actors. This kind of activity has allowed the police to form a more accurate picture of networks involved in pimping and human trafficking and their transactions in the field. This has also facilitated the identification of pimps, sex buyers, brokers and other actors involved in the cases during their investigations. (Eriksson & Björkqvist 2020; Reinikainen 2021.)</p> <p>Information collected has been used to uncover trafficking cases as well as cases of aggravated pimping. The practice has allowed informants to talk about the situations they have seen or experienced in the field with the police confidentially. The police have also been able to inform the persons of their rights and on the features of trafficking, referring the persons to assistance system for victims of trafficking or to other relevant organisations. (Eriksson & Björkqvist 2020; Reinikainen 2021.)</p> <p>Having good relations with the victims allows better and more in-dept investigations and help secure better evidence of human trafficking. According to his book, Eriksson has noticed that when investigating smaller crimes, it is important to hear the victim's story holistically if there is something larger in the background. These stories have led him to bigger cases as well as helped to uncover larger human trafficking networks. (Eriksson & Björkqvist 2020; Reinikainen 2021.)</p>
Geographical scope Where the practice is implemented	Local
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	The stakeholders involved is Helsinki police department as well as the trafficking unit. They cooperate with persons selling sexual services and working in the erotic industries as well as other actors involved in the sex and erotic industries, such as NGOs.
Effectiveness	The Helsinki police crime investigator Kenneth Eriksson's team has handled an average of 50 cases a year. He has been building good relationships

Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>and strengthened trust in the field for decades and his retirement has been postponed several times to make sure that Eriksson's colleagues would be able to continue his work. Practice has also allowed them to build more comprehensive picture of field and networks involved.</p> <p>Limitations with these kinds of practices are that they are reliant on individuals rather than structures or shared methods. The team must be able to work around the clock and cooperate closely. Proactive work requires a lot of resources to achieve results and investigations are often long and demanding. Obtaining information from the victims may be difficult if they have wanted to leave the country or have been deported.</p>
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	The method is in place in Helsinki but could be put into use also elsewhere in Finland. Similar practices could be introduced in other countries.
Resources and further reading	<p>Eriksson Kenneth & Björkqvist Jeanette, 2020. Kovat kadut – ammattirikollisten jäljillä. Helsinki: WSOY. [A biography of Kenneth Eriksson where he describes his working style and events on the field during his career. Eriksson is a pioneer in solving pimping and sex trafficking cases.]</p> <p>Reinikainen Pauli 2021. Henkilöhaastattelu – sitkeä työmyyrä, kovapintainen verkostoituja ja taitava kuulustelija. Kenneth Erikssonin poliisiura hakee vertaistaan. [Personal interview – A tenacious workhorse, a hard-surfaced networked and skillful interrogator. Kenneth Eriksson's police career is unparalleled.] https://www.apu.fi/artikkelit/rikosylikonstaapeli-kenneth-eriksson-saalistajan-palkkio-on-se-kun-saa-saaliin-kaadettua-nurin</p> <p>Yle uutiset 2.1.2021. Pakkotyö, paritus ja seksiorjuus rehottavat – Poliisi käy "nyrkillä" ihmiskaupan vastaiseen iskuun [Forced labour, pimping and sex slavery grow rampant – Police launches attack on human trafficking] by Niilola Merja. https://yle.fi/uutiset/3-11699668</p>

Name	Best practice 12: Risk assessment/indicator lists for identifying cases of human trafficking
Short summary of the practice – What has been done, by whom, when and how? Impact?	<p>Different organisations have created and/or use risk assessment tools and indicator lists for identifying cases of human trafficking. These tools aim to assist e.g. the authorities or NGO staff in situations where they may have encountered a victim of trafficking.</p> <p>The NGO Pro Counselling Centre has created a set of indicators and questions as a part of their anti-trafficking initiative (Askelmerkit dialogiseen tunnistamiseen/Indicators for dialogical identification). The indicators are signs of a person's subordinate position in relation to the possible abuser(s) and deal with i.a. living, working, financial, and social circumstances, as well as the person's general wellbeing, health and</p>

	<p>behaviour. The materials are also featured on the website of the Finnish Assistance system for victims of human trafficking. Pro Counselling Centre has also created animated videos on human trafficking that can be used in e.g. awareness building, training, as well as in working with clients in social and health care.</p> <p>The website of the Police has information on trafficking in human beings, including a list of situations in which the police pay special attention to identifying victims of trafficking – e.g. when encountering persons in cases connected to the sale of sexual services, or when investigating the use of illegal or irregular labour.</p> <p>The FLOW project Investigation tool created by HEUNI and its partners includes a checklist for the identification of labour exploitation for labour inspectors and other authorities, as well as questions for speaking with workers which may help determine whether they are a victim of labour exploitation or trafficking.</p>
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>Indicators, checklists and other tools for identifying victims of human trafficking have been developed within different national/EU-funded projects. Many of them are publicly available online for the use of any relevant organisations. Authorities such as the police also have tools which are not available to the general public. The Finnish Border Guard, for example, uses guidance, indicators and profiles created by European Border and Coast Guard Agency Frontex at border crossing points (Ministry of the Interior 2018).</p> <p>Many of the tools are based on ILO Operational indicators of trafficking in human beings.</p>
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>Existing tools help the authorities and others who come across potential victims of trafficking. They can also help individuals who are unfamiliar with the phenomenon.</p> <p>Different indicators and tools exist but there must also be impetus to put them into use. A possible limitation is that it is practically impossible to have the tools cover all possible forms of exploitation, abuse and control. Moreover, a person may be a victim of trafficking also in situations where the indicators do not seem to apply.</p>
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	Most risk assessment tools, and indicator lists can be used anywhere, although local features and trends of trafficking as well as the victim's situation and background should be taken into consideration. Therefore no one list of risk indicators has been adapted by the Finnish authorities.

Resources and further reading	<p>Pro Counselling Centre https://protukipiste.fi/ihmiskauppa/tietoa-ja-tyokaluja/ Video: Recognize the indicators of human trafficking https://youtu.be/e54vaCB0L4Y</p> <p>Assistance system for victims of human trafficking: https://www.ihmiskauppa.fi/en/information-on-helping-victims/identifying-victims-of-human-trafficking</p> <p>Police: Trafficking in human beings https://poliisi.fi/en/trafficking-in-human-beings</p> <p>Ylinen Pekka, Jokinen Anniina, Pekkarinen Anna-Greta, Ollus Natalia, Jenu Katja-Pia & Skur Thomas 2020. Uncovering labour trafficking. Investigation tool for law enforcement and checklist for labour inspectors. HEUNI Publication Series No. 95a. Helsinki: HEUNI. https://heuni.fi/-/report-series-no.-95a</p> <p>Ministry of the Interior/Sisäministeriö 2018. Border Guard Department. 12.9.2018. Lausunto Eduskunnan hallintovaliokunnalle: Yhdenvertaisuusvaltuutetun kertomus eduskunnalle 2018 (K 6/2018 vp). [Statement on The Report of the Non-Discrimination Ombudsman to the Parliament 2018]. https://www.eduskunta.fi/FI/vaski/JulkaisuMetatieto/Documents/EDK-2018-AK-203319.pdf</p>
Any other remarks	<p>The ILO indicators from 2009 report have been translated into Finnish in the HEUNI report in 2011 (Jokinen et al. 2011). The original source is ILO 2009. Operational indicators of trafficking in human beings. Results from a Delphi survey implemented by the ILO and the European Commission. Revised version of September 2009. Geneva: ILO.</p> <p>(Jokinen Anniina, Ollus Natalia & Viuhko Minna 2011. Ehdoilla millä hyvänsä [On any terms], HEUNI Publication Series No. 67, 251-254. https://heuni.fi/-/report-series-67)</p>

Name	Best practice 13: Potential trafficking victims' discussion with the police facilitated by Victim Support Finland
Short summary of the practice – What has been done, by whom, when and how? Impact?	<p>Victim Support Finland has created a practice in cooperation with the Helsinki police where they facilitate informal discussions between (potential) trafficking victims and officers of the Helsinki police department before the victim decides to report a crime to the police. During this facilitated discussion, a potential victim is able to meet with a police officer from the specialised human trafficking unit to talk about the situation and ask questions related to trafficking and the potential criminal investigation without disclosing their own or their employer's identity. The victim is also provided with a (voluntary) support person to be involved during the pre-trial investigation as well as the trial.</p> <p>The aim has been to build the victims' trust in the authorities so that they would be more willing to file a report with the police as well as ease the victim's mental pressure from reporting the crime. Some of the victims may not trust the police or see them as a source of help based on e.g.</p>

	<p>experiences in their country of origin. Furthermore, the victims do not necessarily see themselves as victims of trafficking, so the police may also use the opportunity to inform the person of their rights and on the crimes of extortionate work discrimination, exploitation and trafficking. In general, when working with victims of human trafficking, the police aim to build trust by ensuring that the victims can always talk to the same police officer.</p> <p>Victim Support Finland has separately trained a special group of support persons who are specialised in providing assistance to victims of human trafficking. The support person makes sure by consulting the victim to ensure that the interpreter used is fit for the role. It is important to ensure that the victim and the interpreter understand each other, and that the interpreter does not have any kind of ties to the victim. The aim is to be able to have same support person through the whole process due to the sensitivity of the matter.</p> <p>Victim Support Finland emphasises that it makes a difference if the victim is referred to an officer/investigator familiar with human trafficking issues from the start. This allows the use of sufficient resources in securing evidence of human trafficking and helps all parties to clarify more details of the proceedings from the start and reduces the need to interrogate victims later on. This in turn reduces the victim's mental stress and is more likely to result in convictions and more case law.</p> <p>If the investigator is unfamiliar with human trafficking, there is a risk that the reported crime may not be qualified or investigated as trafficking or that the investigation may not be initiated quickly enough which leads to problems in securing evidence of the crime.</p> <p>In summer 2021 Victim Support Finland ran a multilingual helpline for foreign seasonal workers who suspected they had been exploited (RIKU n.d.).</p>
Geographical scope where the practice is implemented	Local
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	The stakeholders involved are Victim Support Finland and its specialists working in assisting victims of trafficking in human beings and labour exploitation, as well as the trafficking unit of Helsinki police department.
Effectiveness Is the practice effective and does it create results? Do you have any	The Helsinki police has found the practice to be useful in building trust with potential victims of human trafficking in telling their story and this has allowed them to build more comprehensive picture of the case during the criminal investigation.

statistics? What are the limitations of the practice?	Victim Support Finland has offered special services to victims of trafficking since 2015. In 2021 Victim Support Finland had a total of 675 clients, of which 220 were new clients. From this total of 675 clients, 380 ⁵ were victims of labour exploitation, 87 victims of sexual exploitation and 60 forced marriages or similar kind of an exploitation. Another 21 persons were forced to criminal activities and 12 were exploited for another purposes. (Marttila 2022.)
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	The informal discussion practice is currently in place in Helsinki but could be put into use also elsewhere in Finland. The practice of assigning a support person is established nationally and due strong demand, more support persons have been trained in 2019–2021. Similar practices could be introduced in other countries.
Resources and further reading	Police: Trafficking in human beings https://poliisi.fi/en/trafficking-in-human-beings The practice was recommended in the report by HEUNI on the methods of preventing the exploitation of migrant labour in different countries https://heuni.fi/-/selvitys-ulkomaisen-tyovoiman-hyvaksikayton-torjunnan-menettelyista-eri-maissa RIKU/ Victim Support Finland. n.d. Seasonal work helpline. https://www.riku.fi/seasonalwork/ Marttila Pia 2022. Statistics on the number of victims. Information received in personal communication from Coordinating Senior Advisor in Victim Support Finland Pia Marttila 16 February 2022.

Name	Best practice 14: Regional human trafficking networks facilitated by Victim Support Finland
Short summary of the practice – What has been done, by whom, when and how? Impact?	The NGO Victim Support Finland coordinates local networks against human trafficking in different parts of Finland, i.e. the cities of Oulu, Kuopio, Turku, Tampere, Vaasa and Helsinki. Different organisations take turns in hosting the network meetings and the meetings may have special themes. Depending on each network, the participants include e.g. the police, prosecutor, labour unions, local NGOs, public employment services, etc. This allows the participants to keep track of the local trends and create and maintain connections between different organisations and form networks which can be used e.g. to support the victim or to tip authorities on suspicious practices. Victim Support Finland has also produced short videos into their website for victims to help to gather information about workers' rights in 16 different languages.

⁵ Pia Marttila (Coordinating Senior Advisor in Victim Support Finland) in Twitter <https://twitter.com/piamarttila/status/1485695703955484677>

Geographical scope Where the practice is implemented	Local/regional
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>The central idea of the network is to bring together organisations and individuals whose work relates to tackling human trafficking or helping victims of trafficking.</p> <p>The aim of the network is to improve the level of awareness on trafficking in human beings in different parts of the country as well as to share experiences and to coordinate the local work against human trafficking.</p>
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>The practice increases the situational awareness of human trafficking in each region and helps to set the foundations for multiagency cooperation as operators become familiar with each another and more aware of the work that they do.</p> <p>The actors are bound by confidentiality so they cannot discuss specific cases, but discussion on the level of the phenomenon is possible.</p>
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	<p>The networks have been established in different parts of Finland based on good experiences.</p> <p>Similar networks of local operators could be established anywhere based on existing structures, as long as each organisation is able to designate a person for the network, and there is trust and willingness to communicate between different organisations and operators.</p>
Resources and further reading	<p>RIKU / Victim Support Finland. Labour exploitation. [incl. videos in 16 languages about worker's rights in Finland] https://www.riku.fi/en/various-crimes/labor-exploitation/</p> <p>Ylinen Pekka, Jokinen Anniina, Pekkarinen Anna-Greta, Ollus Natalia, Jenu Katja-Pia & Skur Thomas 2020. Uncovering labour trafficking. Investigation tool for law enforcement and checklist for labour inspectors. HEUNI Publication Series No. 95a. Helsinki: HEUNI. https://heuni.fi/-/report-series-no.-95a</p>

3. Conclusions

A LARGE NUMBER of best practices were collected from Finland. This is partly because there seems to be a renewed momentum in the fight against human trafficking in Finland currently. The governmental programme of Prime Minister Sanna Marin has resulted in several anti-trafficking actions and increases in the resources of key authorities. The launch of a specialised police unit for

trafficking investigations and the increase in the number of labour inspectors specialised in monitoring the use migrant labour are important indications of this commitment.

In 2021, a new National Action Plan against Trafficking in Human Beings was also launched, which is based on five strategic objectives and 55 actions. The plan promotes the detection of human trafficking, improves the standing of victims and enhances the establishment of criminal liability. The plan has resulted in concrete actions among e.g. the police, border guards, prosecutors and labour inspectors in strengthening their work against human trafficking. In addition, the National Strategy and Action plan for Tackling the Grey Economy and Economic Crime includes many important actions that improve and strengthen the work to combat labour exploitation, which helps to prevent human trafficking as well.

The work against human trafficking in Finland now emphasises the importance of multidisciplinary work in ensuring that victims of trafficking are identified in the first place and referred to assistance, but also in ensuring that investigations result in prosecutions and convictions. Different authorities have an important role in the collection of relevant data which can be used to target resources to risk sectors and to conduct joint inspections which involve the police, labour inspectors, tax authorities and other relevant authorities. These help to ensure that potential cases of trafficking and labour exploitation are detected, victims' rights are protected, and the business model of traffickers is disrupted. Therefore, well-functioning exchange of data between different authorities is essential when proactive work is to be developed.

However, multi-agency cooperation should be further strengthened in order to make it more systematic, institutional and structural, so that the work is not dependent upon individual motivated officials, but rather relies on structural level cooperation and mutual respect for different organisations' distinctive mandates and expertise. For multi-agency cooperation to be effective and well-functioning, it requires a common strategy and sufficient resources. A national strategy to address labour exploitation will be developed under the Ministry of Employment and Economic Affairs in 2022 to further strengthen this approach. The results of the collection of best practices will guide the implementation of the next tasks under ELECT THB work package 2, but also give important insights regarding the steps to be taken in work packages 3 and 4.

Estonia

1. Introduction

THE SUMMARY OF the best practices collected in Estonian gives an overview of the methods that are or will be used in order to prevent THB or support the victims of THB in Estonia.

The information about the practices were collected by reviewing and analyzing data collected by research and by sharing information with institutions whose tasks are connected to THB. They were collected by AnnaMarkina, Kevin Reim and Laura Lajal. The relevant materials reviewed in the summary include laws, yearly reviews, institutional websites, media articles and other relevant guidelines or documents. The parties of these practices are the Police and Border Guard Board, Labour Inspectorate, the Ministry of Justice, the Prosecutor's Office, and Ministry of Social Affairs. All the aforementioned institutions are also active partners in different collaboration projects related to THB in Estonia.

The practices in this summary are divided into three categories – Proactive methods employed in the detection of cases of THB, examples of collaboration and examples of risk assessments used to identify potential cases of THB.

2. Best practices collected

2.1. Proactive methods employed in detection of cases

Name	Best practice 1: Regular joint inspections to employment places with foreign employees <i>Field: Labour exploitation</i>
Short summary of the practice – What has been done, by whom, when and how? Impact?	In 2015 National Police and Border Guard Board and Labour Inspectorate signed cooperation contract to execute regular joint inspections to employment places with foreign employees. In 2016 and 2017 several joint trainings were held in four regions in Estonia. Several employees from the police, Labour Inspectorate, Prosecutors Office and Tax and Customs Board took part of the training. From 20.01.2019 Labour Inspectorate has the authority to inspect rental an intermediary employment place.
Geographical scope	National

Where the practice is implemented	
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	Labour Inspectorate mainly engages the registration of the foreign employees. National Police and Border Guard Board, Labour Inspectorate and Tax and Customs Board officiate joint inspections. The participants (also including the Prosecutors Office) are part of regular joint trainings, last of which was held in 2019.
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>In 2016–2020, 475 joint inspections were conducted by Police and Border Guard Board and Tax and Customs Board, 150 of them are associated with foreign employees. In 2020, 121 inspections were conducted, 77 of them were associated with foreign employees.</p> <p>In collaboration with Police and Border Guard Board, Tax and Customs Board and Labour Inspectorate, 31 inspections were conducted to review the working conditions of the foreign employees in 2020.</p>
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	<p>Joint inspection is efficient and economical way of conducting supervision over employment places and is sustainable and transferable.</p> <p>The strategy is mentioned in "2015–2020 prevention of violence report".</p>
Resources and further reading	

Name	Best practice 2: Prevention helpline for the detection on THB cases <i>Field: all forms of THB</i>
Short summary of the practice – What has been done, by whom, when and how? Impact?	<p>In 2019 the Social Insurance Board of Estonia started administering the helpline for the prevention of THB. The aim of the prevention helpline is to inform people of precautionary methods on the THB cases, but also to advice victims of support opportunities.</p> <p>Callers are provided with help during business days and with the opportunity to stay anonymous. Support is available in Estonian, English and Russian.</p>

Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	The helpline is administered by the Social Insurance Board of Estonia. If needed, consulting with IMO is possible. That is mainly done in relation to funding the return of the victim to his or her homeland.
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	In 2020, there were 608 clients that contacted the Social Insurance Board via helpline. The callers are mainly foreigners. In 2020, people from 15 different countries sought help – Estonians, Russians, Ukrainians, Belarusians, Latvians, Uzbeks, Kazhastanians, Indians, Nigerians etc.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	The practice is sustainable and can be transferred to other countries as well.
Resources and further reading	Human trafficking prevention and victims assistance counselling line: https://www.sotsiaalkindlustusamet.ee/en/human-trafficking-prevention-and-victims-assistance-counseling-line

Name	Best practice 3: Cooperation and requests for information from Labour Inspectorate about the background of employers <i>Field: Labour exploitation</i>
Short summary of the practice – What has been done, by whom, when and how? Impact?	Labour Inspectorate has provided the user undertaking – natural or legal person, a website to conduct a request for information about a contract party as a temporary-work agency. It allows to check the background of temporary-agency workers from EU and EEC. For third-country workers, the user undertaking must contact the Estonian Police and Border Guard Board. The aims of this request for information follow from the Directive 2008/104/EC of The European Parliament and of the Council in relation to principles set to temporary agency work. The overall purpose of such request is to assess the protection of the workers, the requirement of

	<p>safety and health at work and the need to ensure that the labour market functions properly and that abuses are prevented.</p> <p>The user undertaking is obliged to provide necessary information about the temporary-work agency or temporary-agency worker of interest. The response will take place within 5 working days from the date of submission of request.</p> <p>Furthermore, Labour Inspectorate has also provided a list of temporary-work agencies who are assigned to user undertakings to work temporarily. The aforementioned list has been utilized since 2017 and gets renewed on Monday every week.</p>
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>The request for information is provided by the Republic of Estonia Labour Inspectorate. Other parties involved are the Member States of EU and EEC.</p> <p>Each Member State of EU must gather necessary and accurate information about employers and employees and provide it to a party conducting the request.</p> <p>Mostly, all information is shared through online platforms by specific requests. Though, there is an ongoing debate at EU level about the regulation of the means, as numerous countries have encountered the same problems.</p>
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	Due to being a relatively new practice, no conclusive results can be identified.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	Due to being a relatively new practice, no conclusive results can be identified.
Resources and further reading	<p>As a product of this practice and its process, Labour Inspectorate provides updated information about user undertakings and their current status on temporary-agency workers with the following link https://www.ti.ee/sites/default/files/lt_teated_31.01.2022_seisuga.xls.</p>

	Directive 2008/104/EC of The European Parliament and of the Council: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0104&qid=1644862535183&from=EN
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2.2. Examples of collaboration

Name	Best practice 4: National Roundtable to Prevent THB <i>Field: all forms of THB</i>
Short summary of the practice – What has been done, by whom, when and how? Impact?	The Criminal Policy Department at the Ministry of Justice hold the post of the National Coordinator on Trafficking in Human Beings in Estonia, including organization of the meetings (national roundtable) of the stakeholders at all levels. The main aim of these meetings is to improve the level of awareness on THB, but also to discuss what kind of services to provide to victims of THB and introduce new guidelines to different parties.
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>National roundtable consists of the following members or officials:</p> <p>Ministry of Education and Sciences Ministry of Foreign Affairs Ministry of the Interior Ministry of Justice Ministry of Social Affairs Office of the Prosecutor General and also prosecutors from the regional offices National Police and Boarder Guard Board, also police officers from regional offices</p> <p>NGOs:</p> <p>Living For Tomorrow, Lifeline, SOS Children Village, Estonian Human Rights Centre European Migration Network contact point Universities (Tartu and Tallinn universities) Social Insurance Board Labour Inspectorate Estonian Unemployment Fund, incl EURES Network in Estonia Chancellor of Justice Office IOM Office in Tallinn US Embassy in Tallinn Ericsson</p> <p>NGOs, who are working with the THB victims and offering services, are full partners in national roundtable and network. There are no special</p>

	criteria for being the member in the roundtable or network. Normally there are 2–3 NGOs mandated to offer services to victims of trafficking and organize assistance.
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	The network meetings increase the awareness of human trafficking in different fields and improve cooperation and the exchange of information between the parties as operators become familiar with the work that each party does.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	Cooperation between relevant parties is one of the most important elements on the prevention of THB, so frequent meetings are essential and sustainable way of doing that. The network is nationwide, so these practices could be transferred to another country.
Resources and further reading	Criminal Policy Department guideline: https://www.kriminaalpoliitika.ee/sites/krimipoliitika/files/elfinder/dokumentid/ik_juhis_2019.pdf GROUP OF EXPERTS ON ACTION AGAINST TRAFFICKING IN HUMAN BEINGS (GRETA) Questionnaire 2017: GRETA 2017 20 RQ1 EST (refworld.org) GRETA's first rapport on Estonia: Publication of GRETA's first report on Estonia - News (coe.int)

Name	Best practice 5: Violence prevention agreement (VPA) <i>Field: all fields of violence</i>
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<p>Short summary of the practice – What has been done, by whom, when and how? Impact?</p>	<p>The Ministry of Justice states that the successful and effective way to prevent and combat violence is by co-operation, cross-sectoral agreements, common goals, and measures. To achieve the goals set in the agreement, specific instructions are additional to department programs (e.g., internal security, welfare, health, education). These programs also provide the resources needed to perform the activities.</p> <p>VPA mostly emphasizes the prevention of violence against children, elderly, mental violence, and THB. To achieve this, an early detection system is developed, the role of the family and the community in responding to violence will be strengthened, prevention and social programs will be expanded, and network-based assistance to victims of violence and measures to prevent the recurrence of violence will be developed. To prevent human trafficking, co-operation was initiated with the Hotel and Restaurant Association and with umbrella organizations in the field of sport on violence against children.</p> <p>The Governance Agreement for 2021–2023 includes the important goal of enhancing the prevention and reduction of violence, and the Action Program of the Government of the Republic 2021–2023 provides for the preparation of a violence prevention agreement, which is set for 2021 up to 2025.</p> <p>VPA is focusing on education, social skills, support and assistance services, economic coping, support for parenthood and carers, a safe environment, norms and values, and legislation to prevent and reduce violence.</p>
<p>Geographical scope Where the practice is implemented</p>	<p>National</p>
<p>Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?</p>	<p>Ministry of Justice coordinates the implementation of the agreement and ensures the exchange of information between violence prevention specialists and stakeholders.</p> <p>Ministry of the Interior, the Ministry of Social Affairs, the Ministry of Education and Research, the Ministry of Culture appoint a representative to Violence Prevention Steering Group.</p> <p>Moreover, the Ministry of Justice co-operates with various Victim assistance organizations and also mediates recommendations and expert opinions of international organizations.</p>
<p>Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?</p>	<p>Due to being a relatively new practice, no conclusive results can be identified.</p>

Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	The program will be reviewed and assessed annually. The Violence Prevention Agreement is based on the long-term strategies of 'Estonia 2035' and the 'General Principles of Criminal Policy until 2030'.
Resources and further reading	The Violence Prevention Agreement: https://www.just.ee/en/crime-and-prevention-crime/violence-prevention-agreement

2.3. Examples of risk assessments used to identify potential cases of THB

Name	Best practice 6: Use of guideline "Undercovering human trafficking and assistance of victims" <i>Field: all forms of THB</i>
Short summary of the practice – What has been done, by whom, when and how? Impact?	The aim of this guideline is quick detection and identification of victims or possible victims of human trafficking and offering them fast, relevant support. These aims are set to be met by large cross-sectoral co-operation. Each Ministry or other stakeholder must inform the Ministry of Social Affairs immediately after encountering and identifying the victim, as well as other parts of interest e.g., National Police or International Market Information System (ITI). Thus, the exchange of accurate and urgent information is ensured. The guideline was published in 2019 by Ministry of Social Affairs.
Geographical scope Where the practice is implemented	National

Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	Ministry of Social Affairs Social Insurance Board Ministry of Justice Estonian Police and Border Guard Board Ministry of the Interior Northern District Prosecutor's Office Labour Inspectorate Ministry of Foreign Affairs NGO Eluliin NGO Living for Tomorrow Haapsalu City All stakeholders report immediately to Ministry of Social Affairs and other related parties/ organizations. In transnational human trafficking cases, the consular assistance must inform the country of residence and Ministry of Foreign Affairs immediately.
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	Due to being a new practice, no conclusive results can be identified.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	The guideline will be assessed regularly.
Resources and further reading	National Referral Mechanism handbook: https://publications.iom.int/books/national-referral-mechanisms-victims-human-trafficking-deficiencies-and-future-development

3. Conclusions

ESTONIA HAS BEEN raising awareness and demonstrating the importance of preventing THB cases by implementing new practices to combat it in the last few years. Most of them are proactive methods, for example co-operation and requests for information from the Labour Inspectorate about the background of employers or prevention helpline for the detection on THB cases. As these practices are relatively new, there is no data yet to evaluate the effectiveness of the practices, but the trend of taking new measures to combat THB is definitely a positive development.

National collaboration has also been substantial in preventing THB as efficiently as possible, as it increases awareness of human trafficking in different fields and improves cooperation and the exchange of information between the parties. Many of these meetings have also brought out the vulnerabilities in the roles of the institutions, which indicates the importance and effectiveness of the roundtables. Knowing these vulnerabilities helps to improve the existing, but also to develop new practices.

The tendency of raising awareness among detection of THB victims is also a positive development, as demonstrates the use of guideline "Undercovering human trafficking and assistance of victims" and co-operation in connection with the violence prevention agreement. Raising people's general knowledge via media articles, social media or guidelines to employers and employees should also be objective to deliver important information to help detect the victims of THB.

In conclusion, Estonia has been active by implementing new measures in the form of proactive methods, collaboration and risk assessments, and will take new steps in combating THB in the future. Still, fundamental conclusions cannot be made in connection with the effectiveness of some of these practices, as there is no data to support it yet.



Latvia

1. Introduction

INFORMATION ON BEST PRACTICES was collected from various sources. They were collected by Agnese Zile-Weisberga as well as Gundega Davidone from the State Labour Inspectorate; Jurijs Misjuns from the Latvian State Police and Daiga Gavariņa from the General Prosecutor's Office. Best practices were selected and reported on a basis of joint methodology which allowed the partner to choose practices for further elaboration and reporting.

Research methods and information sources:

- Desk research – review of policy documents and policy or event briefings, deliverables of the project "FLOW", European Council's GRETA reports, TIP Reports, etc.
- One focus group discussion with 8 representatives from the State Police who have had experience with THB cases. 4 people were representatives of the THB specialised unit, 3 from regional police units and 1 from the unit that specialises in combating sexual exploitation. The interview took place on 9 December 2021. The discussion was moderated by Agnese Zile-Weisberga.
- One focus group discussion with representative from the State Labour Inspectorate. In total, 8 participants from all regional units were represented in the discussion. The discussion took place on 17 December 2021. The discussion was moderated by Agnese Zile-Weisberga.
- The best practice from the point of view of prosecution and court stages that was collected by an expert from the Prosecutor's Office. The expert used methods such as interviews with other prosecutors and review of court cases.
- Minutes of the meeting of the Inter-institutional Working Group on Combating Human Trafficking that was held on 9 November 2021.
- Minutes of the meeting with aviation industries and THB stakeholders (law enforcement, service providers, national coordinator) that was held on 20 October 2021.

2. Best practices collected

2.1. Proactive methods employed in detection of cases and exchange of intelligence

Name	Best practice 1: Regular joint inspections to employment places with foreign employees <i>Field: Labour exploitation</i>
Short summary of the practice – What has	The State Border Guard together with the State Labour Inspectorate, and less often with the State Police carry out joint inspections to employers that employ foreign nationals. The State Police usually

<p>been done, by whom, when and how? Impact?</p>	<p>joins (or vice versa) visits which are initiated due to suspicions of a crime occurring.</p> <p>Inspections can be initiated by each authority. Sometimes visits are initiated by the State Border guard upon the information that has been received from the Office for Citizenship and Migration Matters.</p> <p>Sometimes inspections can be initiated the State Police upon suspicions, where more evidence are necessary to find evidence of criminal activities. For example, officially, the State Labour Inspectorate declares that the place was chosen according to neutral criteria (annual working, plan, location, sector etc.), but inspectors are gathering concrete evidence for possible violations.</p>
<p>Geographical scope Where the practice is implemented</p>	<p>National.</p>
<p>Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?</p>	<p>These stakeholders were identified:</p> <ul style="list-style-type: none"> • The State Boarder Guard • The Labour Inspectorate • The State Police • The State Revenue Service (tax authority) <p>The joint visits are mainly carried by the State Border Guard and the State Labour Inspectorate. Less often the State Police and the State Revenue Service join these visits and mainly upon their initiative.</p> <p>There are no specific agenda or timeline of these visits. For example, the State Labour inspectorate and the State Boarder Guard carry out more than 300 hundred joint visits a year. It could be described more as a routine work. As a priority these joint visits are carried out in cases if a risk information is received from the Office of Citizenship and Migration Matters, the State Labour Inspectorate, the State Police or other, and anonymous sources.</p>
<p>Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?</p>	<p>In 2020, the State Boarder Guard didn't report any case of identified THB. The Labour Inspectorate reports on case that was proceeded as a criminal case of THB. However, the system and legal framework of this system itself is very important fundament which can be used to gather evidence. For example, the State Police reported a case where before operation, it was agreed with the State Labour Inspectorate to organise several control visits to suspicious places.</p>
<p>Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?</p>	<p>It is a routine practice foreseen in the mandate of involved institutions, it means that financial and human resources are foreseen annually. For the State Boarder Guard, it is a practice to check compliance with migration and residence rules, for the Labour Inspectorate it is a method to check undocumented labour.</p>

Resources and further reading	<p>The annual report of the State Boarder Guard 2020: https://www.rs.gov.lv/lv/media/5848/download</p> <p>The annual report of the State Labour Inspectorate 2020: https://www.vdi.gov.lv/lv/parskati</p>
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Name	<p>Best practice 2: Helplines and consultations provided by the service providers</p> <p><i>Field: all THB forms</i></p>
Short summary of the practice – What has been done, by whom, when and how? Impact?	<p>Centre MARTA and "Shelter "Safe House"" maintain telephone helplines where people can call and ask for information for any question related to trafficking in human beings. These helplines mainly ensure information and possibility to report on possible case.</p>
Geographical scope Where the practice is implemented	<p>National, and can receive calls from other countries.</p>
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>Not applicable.</p>
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	<p>The State police reports that in 2021 two criminal proceedings were started pursuant to these consultations. The service providers have in total identified 28 cases when a person after consultation has reached out for help.</p> <p>The number of phone calls increases upon informational activities. For example, when distributing information in local commuting places and public transport.</p> <p>Data on consultations</p> <p>Centre MARTA data:</p> <ul style="list-style-type: none"> • Consultation (face-to-face, help-line or other) – 600 • Number of cases, when persona after the consultation has turned for help – 24 • Most frequent consultation themes – risk assessment on repeated exploitation, housing service, help with documents, legal consultation, life-skills. <p>Shelter "Safe House" 2021 data:</p>

	<ul style="list-style-type: none"> Received calls with questions on trafficking in human beings – 59 Email consultations – 32 Number of cases, when persona after the consultation has turned for help – 4 Most frequent consultation themes – what to do? Am I a criminal? Fear and shame for the situation.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	<p>Sustainability largely depends on the available funding. If service providers lack sufficient funding, these telephone helplines could be cancelled. There are various financial sources to maintain these helplines.</p> <p>Practice can be transferred to other countries.</p>
Resources and further reading	<p>Helpline of the "Centre MARTA": https://marta.lv/lv/marta-darbiba/cilveku-tirdznieciba/</p> <p>Helpline of the "Shelter "Safe House"": https://www.patverums-dm.lv/lv/kur-meklet-palidzibu</p>

Name	Best practice 3: Screening of people in international protection and forced return procedures <i>Field: all exploitation forms</i>
Short summary of the practice – What has been done, by whom, when and how? Impact?	<p>This practice that is overall regulated at the EU level, but each country has its own practice and legal framework.</p> <p>Latvia is screening potential trafficked persons in international protection and forced return procedures. There are standardised practices in place for detecting, identifying and referring victims of trafficking in human beings when they are detected in international protection procedures. These practices are outlined in the law. Screening of asylum applicants is carried out during initial and in-depth interviews.</p> <p>Some of criteria during the screening are defined in the Asylum law, for example that the State Boarder Guard receive all relevant training regarding international human rights, acquis of the European Union in the field of asylum and negotiation methods. The asylum interview must happen in the language that both parties understand, or the State funded translator is ensured. In case of minors, these interviews can be carried out only by a person who is trained to interview a minor. For vulnerable groups, including victims of trafficking in human beings, the special procedure is applied.</p> <p>In case of forced return procedure, the observation is ensured by the Ombudsman. The specialists of Ombudsman are trained and have a questionnaire that includes indicators on trafficking in human beings. Beside a guideline and methodological materials are prepared to ensure</p>

	that the victims of trafficking in human beings can be detected during the forced return procedure.
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>This practice is institutionalised. Several institutions have a mandate to participate in the screening or observation, e.g.:</p> <ul style="list-style-type: none"> • The initial interview is ensured by the State Border Guard, who then provide information to the Office for Citizenship and Migration Matters specialists for their interview. • In case of unaccompanied minors, representative is ensured from the so-called Orphans' court that must work in the best interests of the child. • If during interview signs of sexual abuse or THB are detected, the State police are invited to the process. <p>Regulation on <i>Procedures for Cooperation between Institutions Subordinate to the Ministry of the Interior Involved in the Asylum Procedure and Procedures for Implementing the Resettlement of Persons</i> was adopted in September 2021. This internal regulation that defines cooperation, including in case of possible THB.</p>
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	Even though no cases of identification of the victim during the interview or observation of the forced return procedure have been reported, all involved stakeholders assess this screening procedure as necessary. Specialists have also claimed that since the number of asylum seekers is low, current procedure allows to gather information in detail. And for low number of cases, the procedure is effective.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	<p>This practice is institutionalised at the EU level. More specific criteria and procedure are defined in the Asylum law, internal regulations, guidelines, and educational materials. Non-regulated materials are developed and disseminated within the framework of projects.</p> <p>Practice is already implemented in most EU countries.</p>
Resources and further reading	<p>The Asylum law: https://likumi.lv/ta/en/en/id/278986-asylum-law</p> <p>The Guideline on improving observation of the forced return procedure: https://www.tiesibsargs.lv/uploads/content/apvienotais_compressed_1582793862.pdf</p> <p>Education materials for observants of the forced return procedure: https://www.tiesibsargs.lv/news/lv/tiessaistes-apmacibas-cilveku-tirdzniecibas-upuru-atpazisana-izraidisanas-procesa</p>

Name	Best practice 4: Proactive involvement of the responsible prosecutor and prosecutors that specialises in THB cases <i>Field: all THB forms</i>
Short summary of the practice – What has been done, by whom, when and how? Impact?	<p>Both the police officers and the expert from the Prosecutor's Office highlighted that it is important that the responsible prosecutor: 1) has a speciality in THB cases and 2) is actively involved in the possible or started criminal proceedings at a very initial stage, since this can positively impact pre-trial investigation. This approach provides collaboration to gather all necessary evidence and ensures that evidence is enough for the court sentence. This also helps to avoid difficulties in stage of prosecution due to lack of evidence.</p> <p>Some of identified benefits:</p> <ul style="list-style-type: none"> • Helps to choose investigation tactics to gather necessary evidence, including gathering analysis of financial flows, objective evidence etc. • Supports targeted involvement of other control institutions that help gathering evidence, e.g., labour inspectors gather evidence that indicates occurring crime. • Targeted and thoughtful victim's interrogation that helps to identify new investigation directions. If a potential victim has mental disorder, also relatives or friends can be invited for interrogation. • Invitation of specialists who can explain to court or other involved actors about vulnerability of THB victims.
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>Main stakeholders:</p> <ul style="list-style-type: none"> • The State Police. • Prosecutors. <p>Also, other institutions can be as stakeholders, if their action or expertise is necessary for the process.</p>
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	This approach was highlighted by the police officers who said that cases with active involvement of responsible prosecutor are more successful.
Sustainability and transferability	Overall, all prosecutors must be involved in the case at initial stages, so this aspect is institutionalised. However, trafficking in human beings is complex, including victims don't recognise themselves as

Is the practice sustainable on the longer run? Could it work in another region or country?	<p>victims, lie or refuse to cooperate with investigators. Therefore, it is important that the prosecutor and investigators have good knowledge of THB so that they can choose the right tactics for these cases, and this requires active participation.</p> <p>Practice can be transferred to other countries.</p>
Resources and further reading	<p>Website: http://www.prokuratura.gov.lv/en</p> <p>ICMPD – Anti-Trafficking Training for Judges and Prosecutors – Handbook, Background reader and Curriculum: https://ec.europa.eu/anti-trafficking/icmpd-anti-trafficking-training-judges-and-prosecutors-handbook-background-reader-and-curriculum_lv</p>

2.2. Examples of risk assessments used

Name	<p>Best practice 5: Use of “Uncovering labour trafficking – Investigation tool for law enforcement and checklist for labour inspectors”</p> <p><i>Field: labour exploitation</i></p>
Short summary of the practice – What has been done, by whom, when and how? Impact?	<p>Materials such as “Uncovering labour trafficking – Investigation tool for law enforcement and checklist for labour inspectors” from the project FLOW are recognised as helpful materials to detect possible THB cases, and to gather necessary evidence. Especially, these tools are helpful if indicators are not visible, for example, indicators of insecure state that are more emotional and subjective.</p>
Geographical scope Where the practice is implemented	<p>National.</p>
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<p>The State Police</p>
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the	<p>During focus group discussion investigators confirmed that they use the FLOW tools and gave positive assessment of the tool for investigators. More scientific assessment procedure of the effectiveness has not been carried out. Police indicated that this tool</p>

limitations of the practice?	is especially helpful in identifying vulnerability and abuse of person's vulnerability.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	Currently, the tool is not institutionalised and is used by investigators as a supporting tool. There is a risk that the knowledge is not transferred, therefore, it is important that the tool is integrated in code of practice in a more institutional way. Practice is and can be transferred to other countries.
Resources and further reading	Information on the project flow: https://heuni.fi/-/flow

Name	Best practice 6: Self-reporting questionnaire for foreign employees at risk <i>Field: labour exploitation</i>
Short summary of the practice – What has been done, by whom, when and how? Impact?	<p>If during the survey it is discovered that the employee doesn't have a signed contract with the employer, or if there are suspicions about employment conditions that are unfavourable to the employee, the State Labour Inspectorate uses a special questionnaire. The questionnaire is given to people who speak Russian (understand). Usually, employees fill in the questionnaire by themselves (self-reporting), but alternatively these questions can be asked by the inspector. The questionnaire includes questions on agreement, working hours, working conditions, salary, etc. These answers provide legitimate ground for inspectors to identify undocumented labour.</p> <p>Questions included in the questionnaire:</p> <ul style="list-style-type: none"> • What is your work? • Who supervises you, defines your daily tasks? • How many days per week do you work? How many hours? • What kind contract do you have (written, other, none)? • Do you have your copy of the contract? • Who was the other party of the contract? • When and where did you sign the contract? • Does your employer provide all necessary equipment for you? • What is your monthly salary? • Have you been instructed of safety? • Do you have a working permission in Latvia? • Where is your passport? Do you have it or is it in the possession of your employer? • Who ensures accommodation for you? • Can you move freely or act according to your rights? • Who brought you to Latvia and when? • Who pays salary to you? • Does anyone intimidate you or use physical force against you?

	<ul style="list-style-type: none"> Other comments.
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	The State Labour Inspectorate
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	Inspectors described the questionnaire as a valid and necessary tool to detect undocumented employment. However, as soon as potential criminal exploitation or other crimes are detected, these cases are forwarded to the State Police and inspectors were reluctant in assessing the role of the questionnaire to detect trafficking in human beings.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	<p>The questionnaire is part of materials and tools for the labour inspectors. The practice is institutionalised and regulated internally. The questionnaire can be amended easily.</p> <p>Practice can be transferred to other countries.</p>
Resources and further reading	<p>The questionnaire (unpublished, question included in the description).</p> <p>Website of the inspectorate: https://www.vdi.gov.lv/en</p>

2.3. Examples of collaboration at the local, national and international levels

Name	Best practice 7: Local level coordination group in Liepāja <i>Field: all THB forms</i>
Short summary of the practice – What has been done, by whom, when and how? Impact?	Liepāja city has established coordination group on action against trafficking in human beings. It is cross-sectoral group that can cover main issues of THB prevention, identification, and continuous support after rehabilitation. All members of this group have received training and are specialists in policy against trafficking in human beings. However, since the pandemic meetings of this group have not been organised.
Geographical scope Where the practice is implemented	Local – Liepāja
Stakeholder collaboration	<p>Members:</p> <ul style="list-style-type: none"> Liepāja city municipality.

Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	<ul style="list-style-type: none"> • Prosecutor's office. • Municipal Police Juvenile Affairs Division. • Children's Rights Protection Divisions of the Education Board. • Orphans' courts. • Criminal police. • Office of Citizenship and Migration Affairs. • EURES offices of the State Employment Agency. • Immigration Service of the Liepaja Department of the State Border Guard. • Social Service. • Kurzeme regional courts. • University of Liepaja. • City newspaper.
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	Impact assessment has not been carried out, therefore, the effectiveness or the added value of this group is not clearly visible. However, during the focus group discussion this approach was mentioned as a good practice. Also, Riga city had similar <i>ad hoc</i> approach when a number of "massage salons" were opened in Riga and a cross-sectoral approach was necessary to address this issue.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	<p>The group was established in 2003 and meetings were organised regularly until early 2020. Since the pandemic meetings of this group have not taken place. Currently, there are some doubts on the future of the group.</p> <p>Practice can be transferred to other municipalities and countries.</p>
Resources and further reading	Information about the work of the group: http://www.cilvektirdznieciba.lv/lv/liepajas-pilsetas-pasvaldiba-par-cilveku-tirdzniecibu-macas-ne-tikai-specialisti-bet-ari-profesionali/204

Name	Best practice 8: One coordinating prosecutor who specialises in cases of trafficking in human beings and consults other prosecutors <i>Field: all THB forms</i>
Short summary of the practice – What has been done, by whom, when and how? Impact?	<i>Promising practice</i> Since 14 January 2022 a new consultation mechanism was introduced in the prosecution with an aim to improve cooperation and quality. Now one prosecutor with an experience in cases of human trafficking support prosecutors with less experience. The coordinating prosecutors can also consult other colleagues in cases of setback or problems. If it is not possible to solve the situation, the coordinating prosecutor should address these issues to higher prosecutors or head of the institution.

	Such consulting prosecutors have been created in a number of fields and trafficking in human beings is one of them.
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	The Prosecutor's Office
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	It is a new approach that aims to increase effectiveness and quality. However, it is too early to assess the impact of this approach.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	The practice is institutionalised, therefore can be assessed as a sustainable practice. Yes, the practice can be transferred to other countries.
Resources and further reading	Website: http://www.prokuratura.gov.lv/en

2.4. Best practices on the pre-processing of complaints and reports by different police departments

Name	Best practice 9: Specialised unit at the State Police
Short summary of the practice – What has been done, by whom, when and how? Impact?	<p>Majority of THB criminal proceedings (Criminal law section 154.1) are investigated by the 3rd Unit of the Organised Crime Enforcement Department of Criminal Department of the State Police. The unit specialises in THB and pimping cases. However, if the crime is conditional, but not complicated, then it can be investigated by other unit, for example regional units.</p> <p>The unit also investigates proceedings that are related to trafficking in human beings, mostly, those are cases of pimping, sending for sexual exploitation, organisation of brothel and involving persons in prostitution, sham marriages.</p>

	<p>Together with other control agencies the unit performs raids or control visits to risks or suspicious places.</p> <p>If the proceeding is international, the unit organises/participates in coordination meetings to decide which would be the most appropriate investigation model: Operational Task Force (OTF), European Investigation Order (EIO), Joint Investigation Team (JIT)</p> <p>The unit ensures analytics necessary to detect possible THB cases, such as persons, addresses, places, means of communication. This also encloses information on organised criminal groups, their member and relation to each other.</p> <p>The unit also ensures the Internet monitoring to detect and identify potential victims of trafficking in human beings.</p> <p>In addition, unit monitors the overall situation so to identify trends and risks. The unit regularly exchange information with other control agencies (e.g., labour inspectorate). On a basis of monitoring, the unit also prepares recommendations for operative work and policy.</p> <p>The unit also serves as a "know-how" for other police units that initiate criminal proceedings related to trafficking in human beings.</p>
Geographical scope Where the practice is implemented	National
Stakeholder collaboration Are other stakeholders involved and how? Do they exchange data/tips etc.? How does the cooperation function in practice?	All institutions that collaborate with the specialised unit.
Effectiveness Is the practice effective and does it create results? Do you have any statistics? What are the limitations of the practice?	During the focus group discussion, the role and support of the specialised unit was highly appreciated not only by the other police units, but also by other stakeholders (e.g., the State Labour Inspectorate, service providers, the Prosecutor's Office). All involved parties agree that the specialised unit at the State Police is very important in combating trafficking in human beings.
Sustainability and transferability Is the practice sustainable on the longer run? Could it work in another region or country?	<p>The State Police structure is institutionalised and defined. It receives annual funding from the State budget (budget programme of the State Police).</p> <p>Yes, the practice is transferable to other countries.</p>

Resources and further reading	Website of the State Police: https://www.vp.gov.lv/lv
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3. Conclusions

THIS EXERCISE of identifying best practice in prevention, detecting and investigation THB, has also highlighted several overarching points that need to be addressed in conclusions.

Firstly, it was discovered that practices are considered to be effective mainly on a basis of the opinion of experts. It means, that there is a lack of scientific evidence on efficiency or effectiveness or there is a lack of evaluation of different practices that can really prove the causality and effectiveness. At the same time, there is a question, do we need to perform scientific evaluation for all practices or part of them, such as campaigns or results of trainings.

Secondly, some practices that were identified as good practices were not institutionalise or structured, they actually depend on individuals or enthusiasts. For example, even though the material "Uncovering labour trafficking – Investigation tool for law enforcement and checklist for labour inspectors" was assessed as a very helpful tool, it was not institutionalised and the use of it largely depends on investigators. Also, the active involvement of a prosecutors was assessed as a very important factor during the investigation, but, similarly, it depends on a prosecutor. The same would apply for joint control visits, since people know each other, they can call directly to other people for consultations.

On a positive side, results of this micro study revealed that specialisation or knowledge and skills are a key for better detection of potential THB case. Moreover, it is not only about the specialisation in police or prosecution, but specialisation of other involved actors is also essential, for example, if the police need to hide or refer a person, it is crucial to have a service provider that collaborates. For detection of potential victims, it is important that the State Boarder Guard, the State Labour Inspectorate also have at minimum people that are responsible and trained in the topic.

The results of the best practice collection can be used in upcoming activities of the project. For example, it would be worth discussing with national experts the evaluation of results/effectiveness of practices and institutionalisation of practices that now are more based on enthusiasm. These results can also be used to tackle participants for trainings and national/ international events during forthcoming project activities.