

Nordic Perspectives on Labour Exploitation

Intersections of Work-Related Crime and Work-Environment Risks

Natalia Ollus
Anniina Jokinen
Isabel Schoultz
Synnøve Økland Jahnsen
Anne Mette Ødegård
Anni Lindroos
Sofie Relander
Jenna Kenttälä

HEUNI

AUTHORS:
Natalia Ollus, Anniina Jokinen, Isabel Schoultz, Synnøve Økland Jahnsen, Anne Mette Ødegård, Anni Lindroo, Sofie Relander and Jenna Kenttälä.

EDITORIAL DESIGN AND ILLUSTRATIONS:
Lea-Maija Laitinen
www.leamaija.works

WE WISH TO THANK:
Saara Haapasaari, Anette Bäckström and Carolina Bäckström, and all others who have contributed to this report as well as Aleksandra Anikina for the visual input for the report and checklist. We also wish to extend our sincerest thanks to all the Nordic experts who joined the project's reference group, as well as the focus group and round table participants in all five Nordic countries.

Published in Helsinki by the European Institute for Crime Prevention and Control, affiliated with the United Nations (HEUNI) in 2025.

This report has been prepared with funding from the Nordic Council of Ministers by experts at HEUNI, Fafo and Lund university. The report is a response to a call by the Nordic Work Environment Committee in early 2024 seeking research on the relationship between labour market crime and work environment risks, with the aim of generating more knowledge and practical recommendations and solutions.

HEUNI Report Series no. 111.

ISBN 978-952-7614-12-9 (PDF)
ISSN 2814-9106 (online)

INTEGRATE

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

Nordic Council of Ministers

HEUNI

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

Fafo

Lund University

Sociology of Law Department

FACULTY OF SOCIAL SCIENCES

THE CONTENT of the publication represents the views of the authors only and is their sole responsibility. The Nordic Council of Ministers does not accept any responsibility for use that may be made of the information it contains.

Content

Introduction 7

Background 7

Aim of this report 9

Terminology 11

Data and methods 13

Focus group discussions with experts 14

Part I: Setting the scene – literature and background 17

Context 17

From social dumping to work-related crime: do these broad concepts sufficiently consider victims of labour exploitation and contribute to their identification? 17

How does labour exploitation manifest in the Nordic and Baltic context? 23

Interlinkages between work environment risks, occupational health and safety and labour exploitation 27

What are work environment risks and how are they regulated and monitored? 28

What are the risks faced by vulnerable migrant workers? 30

Key findings from part I 36

Part II: Institutional, Legal, and Structural Challenges in Tackling Labour Exploitation – empirical findings 37

Institutional Limitations 38

Do labour inspectorates have the mandate to monitor exploitation among migrant workers? 38

Can occupational safety and health frameworks be used to uncover indications of labour exploitation when there is no explicit mandate to oversee salaries and working conditions? 40

Worker Representation and Mobilisation 43

Why do trade unions struggle to mobilise and support migrant workers? 43

What is the role of social partners in addressing labour exploitation? 44

Legal Framing and Enforcement Failures 47

What are the differences in how labour exploitation is processed as a crime in the Nordic countries? 47

What is the role of the A-krim centers in processing work-related crimes and protecting the rights of exploited workers? 50

Hidden Exploitation and Access to Justice 57

What schemes are used to hide exploitation from monitoring authorities? 57

Do exploited workers have options to claim their unpaid wages? 60

Key findings for part II 63

Part III: Prevention, Enforcement, and Protection Against Labour Exploitation – empirical findings 64

Strengthening Policies, Inspections and Monitoring 65

National policies as strategic tools 65

Expanding the mandate of labour inspectors and social partners as a way of addressing labour exploitation 68

Speaking with the workers during workplace inspections and using interpretation 70

Using indicators for identifying work-related crime and exploitation 74

Introducing administrative sanction fees for labour law violations and focusing inspections to risk targets 76

Criminal law as a tool to address exploitation 78

Criminalisation of wage theft 78

Criminalisation of extortionate work discrimination and usury in employment 81

Criminalisation of human exploitation 83

Migrant Worker Protection and Prevention 84

Facilitating the reporting of exploitation and informing the workers of their rights 84

Facilitating better access to remedy and claiming unpaid wages 86

Strengthening residence permit options 90

The role of businesses and public procurement entities in countering exploitation 94

Use of labour clauses to ensure proper working conditions in public procurement contracts and limiting the supply chain 94

Promising initiatives in the construction sector 95

Key findings from part III 99

Conclusions 100

Concrete recommendations 104

References 108

Literature 108

Laws andgovernment proposals 121

Media sources 122

Fact sheet: Work-Related Crime, Labour Exploitation and Occupational Safety 126

Fact sheet 127

Work-Related Crime, Labour Exploitation and Occupational Safety 127

What are the key concepts used? 127

What does labour exploitation look like, and how do exploitative business models operate? 127

What are the main risks for migrant workers and how is exploitation linked to the work environment? 128

What approaches do Nordic countries apply to tackle the risks? 128

The Intergrate project 128

Checklist: Uncovering Occupational Safety Risks Linked to Labour Exploitation 129

Checklist 130

Breaches concerning workplace inductions 130

Breaches concerning working hours 130

Breaches concerning work clothing and gear 130

Breaches concerning employment responsibilities 130

Breaches concerning safety measures 131

Breaches concerning employer-provided accommodation 131

Breaches concerning psychosocial stress 131

What should be done if signs of occupational safety and health and/or labour exploitation are uncovered? 132

Additional indicators of labour exploitation include 132

Tips for encounters with migrant workers who may have experienced exploitation 133

Key national contact details 133

Recommended reading 133

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Introduction

Background

Maintaining fair and orderly conditions within the labour market is deemed a crucial component of the Nordic region's competitiveness (Nordic Council of Ministers 2022). This principle underpins the shared history among Nordic countries of standing together in support of free competition and mobility. It also recognises a responsibility to develop policies that promote healthy work environments, prevent discrimination, and protect against occupational hazards.

THIS REPORT explores the concrete linkages between work-related crimes, work environment risks and labour exploitation in the Nordic countries. The focus of the report is on labour exploitation as a specific area of work-related crime.

Labour exploitation of migrant workers can be considered a form of work-related crime and as such represents a multifaceted social challenge that pervades various industries of the economy, among others construction, cleaning, restaurant, agriculture and transport. Many of the violations and crimes take place in employment relationships and are targeted at workers, thus infringing on their labour rights (Jokinen et al, 2011; Jahnsen 2014; 2024; Ollus 2016a; Brunovskis & Ødegård 2022). Labour exploitation and work-related crimes not only undermine the integrity of these risk sectors but also jeopardize the safety and well-being of workers by compromising established health and safety standards. The consequences of such crimes in different sectors may include labour exploitation, substandard working conditions, and violations of workers' rights, highlighting a broader spectrum of occupational hazards and the variations and similarities that might exist across sectors. Workers may experience poor terms of employment, are demanded overly long hours, are underpaid, and due to their vulnerable position are unable to change their employment situation. The exploitation often takes place

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

within legitimate structures of business and is driven by profit (Jokinen & Ollus 2019).

The issue of labour exploitation is most pronounced with cross-border labour – migrant workers – as they may be unaware of the terms of employment and labour rights in the country of destination and may thus be more vulnerable to exploitation and abuse. The transnational nature of such labour introduces additional challenges in monitoring, regulating, enforcing and ensuring compliance with labour standards, thereby increasing the opportunities for work-related crimes to occur. The exploitation of migrant workers affects all of the Nordic countries and is in many ways embedded in the structures of the economy and the labour markets, such as e.g., subcontracting schemes and the posting of workers (Ollus 2016b), with migrant workers upholding working positions that are often dirty, dangerous and demeaning (Overgaard et al. 2023).

Against this background work-related crime is commonly described as a typical 'wicked problem' that demands a holistic strategy that addresses its root causes, safeguards workers across all sectors, and ensures a fair, safe, and equitable working environment for all (Neby et al. 2017; Jahnsen & Rykkja 2020). The term 'wicked issue', originally introduced by Rittel and Weber (1973), is not only used to describe its complexity, as being a policy problem that is both difficult to define and measure, but also as one which can be 'tamed' (rather than solved) through multi-agency responses and public private partnerships (Head 2022).

The report emphasises that labour exploitation is a complex phenomenon, which requires coordinated, multi-agency responses. When labour exploitation fulfils the elements of crime, it requires acknowledgement and action from the criminal justice system. However, while law enforcement plays an essential role, work-related crime requires also broader administrative, multi-agency and preventive responses.

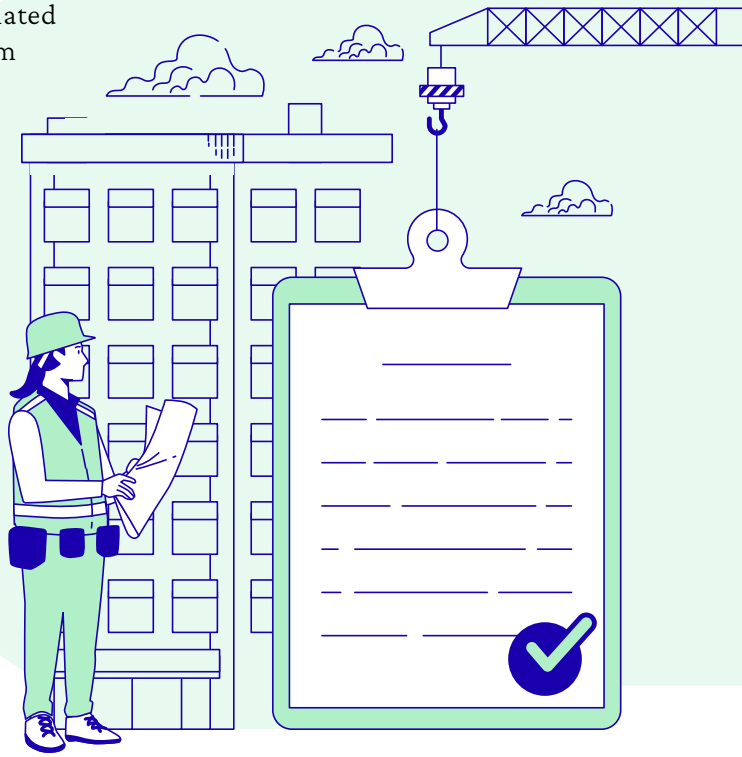
CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Aim of this report

TAKING INTO account both the similarities and differences between the Nordic countries, this report aims to enhance the Nordic knowledge base about work-related crimes and work environment risks. We will in particular focus on exploitation of (migrant) workers and risks related to the work environment, and on successful and promising measures to prevent and address such breaches and crimes. The report aims to generate more knowledge and practical recommendations and solutions in these areas. The report is intended to help work environment experts, regulatory authorities and other key stakeholders address labour exploitation.

While the report focuses on the Nordic region, the Baltic countries remain a region of labour supply for the Nordic region, as well as a transit region and country of destination for workers from third countries. There is also ongoing Nordic-Baltic cooperation within the framework of the Nordic Council of Ministers in questions of occupational health and oversight. The report is thus intended to function as a source of information also for Baltic counterparts. Some selected examples from the Baltic region have also been included in the report.

This report is structured into three main parts, each addressing a distinct dimension of labour exploitation and work-related crime in the Nordic context. The aim is to provide a comprehensive, multi-disciplinary understanding of the phenomenon, its manifestations, and the institutional responses available.



CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Part I: Setting the Scene

THE FIRST PART lays the groundwork by exploring the broader context of labour exploitation, including conceptual challenges, regional manifestations, and the intersection with occupational health and safety, which can be seen also as a part of work-related crime. It highlights how vulnerable groups, particularly migrant workers, face increased risks and negative health outcomes due to exploitative working conditions.

Part II: Institutional, Legal, and Structural Challenges

THE SECOND PART examines the limitations and gaps within existing institutional and legal frameworks. It discusses the mandates of labour inspectorates, the role of social partners, and the enforcement challenges in addressing labour exploitation. It also explores hidden forms of exploitation and barriers to justice for affected workers.

Part III: Prevention, Enforcement, and Protection

THE FINAL PART focuses on forward-looking strategies and promising practices. It presents measures to strengthen inspections, expand legal tools such as criminalisation of wage theft, and improve protections for migrant workers. The role of businesses and public procurement entities is also considered, with examples of sector-specific initiatives mainly from the construction sector.

THE FINAL section of the report provides conclusions, a set of concrete recommendations, as well as a checklist or list of indicators of occupational safety and health breaches that can point to possible exploitative working conditions. The list works as a stand-alone document, and our hope is that it will be useful for inspection agencies, labour market parties and others who oversee working conditions of migrant workers. The checklist aims to showcase that occupational safety and health breaches that involve migrant workers in risk sectors merit also further attention to broader work-related crimes and exploitative labour conditions.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Terminology

WORK-RELATED CRIME is sometimes also referred to as labour market crime, work-life crime or work environment crime, and covers a wide range of labour-related crimes and financial crimes taking place within the labour market (Jahnsen, Gjesdal & Andersen 2022; Regjeringen 2015). The Norwegian authorities define work-related crime as "activities that breach laws concerning pay and working conditions, social security and taxation. These are organised activities that exploit employees, distort competition and undermine social structure. It may involve tax-related crime, gross breaches of accounting and bookkeeping practices, corruption, bankruptcy crime, money laundering, foreign currency smuggling, human trafficking, social security fraud, serious fraud, use of false identities, registration of incorrect information in public registers, violations of pay and working conditions and use of illegal workers." (Office of the Prime Minister 2017, 7–8.) The concept has since been also adopted in national strategies in Sweden and Iceland but is not widely used in Denmark and Finland.

LABOUR EXPLOITATION refers to situations where a person is paid less than the wage set by law or collective agreements and the basic regulations regarding working hours, compensation for overtime or weekend work, vacation or occupational health are not respected. Exploitation can be seen as a continuum of situations and acts, which range from less severe to more severe forms of exploitation. Depending on the severity of these situations, the cases can be defined as different types of labour offences, human trafficking or related offences. The European Fundamental Rights Agency defines severe labour exploitation as forms of exploitation of workers which are criminal under the legislation of the EU Member State where the exploitation occurs (FRA 2015).

SOCIAL DUMPING refers to the practice of giving workers, and particularly migrant workers, significantly poorer wage and employment conditions than local workers (Regjeringen 2022). It means practices where existing social regulations concerning e.g. wages, working and living conditions are undermined or evaded with the aim of gaining competitive advantage.

WAGE THEFT refers to situations where the employer intentionally and for their own benefit unlawfully withholds money from the employee's wages, holiday allowance or other

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

statutory payments, or does not pay wages at all. Norway criminalised wage theft as a separate offence in 2022 as the first country in Europe.

HUMAN TRAFFICKING FOR THE PURPOSE OF FORCED LABOUR refers to a situation where a person's vulnerabilities are used in a way that severely restricts the person's alternatives, and the person is placed in a situation of forced labour or distress. Typically, victims of trafficking for forced labour are made to work long hours with little or no pay, they may be abused, threatened, or held in debt bondage, and their freedom of movement may be restricted. In practical terms, forced labour can be a situation where e.g., a person is deceived, is isolated, physically or sexually violated, threatened, is not receiving wages, has his/her passport taken away, endures abusing working conditions and excessive overtime (ILO 2012).

EXTORTIONATE WORK DISCRIMINATION refers to a situation where a worker is placed in a considerably inferior position through the exploitation of the job worker's economic or other distress, dependent position, lack of understanding, thoughtlessness or ignorance. The provision was introduced into the Finnish criminal code in 2004 and has been used in Finland in cases concerning exploitation of migrant workers. The provision is to be replaced in 2026 with a new provision on usury and aggravated usury in employment.

MIGRANT WORKERS refer to all worker that are not native to the country of destination. This includes third country nationals, EU/EEA citizens, as well as undocumented migrants.

OCCUPATIONAL SAFETY AND HEALTH (OSH) cover all aspects of workplace health and safety, aiming to prevent accidents and diseases. A safe work environment minimises risks through all practicable measures, including through prevention.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Data and methods

RESEARCH HAS shown that the uptake of new knowledge into practical use is often slow and uneven, highlighting the need for more deliberate strategies to bridge the gap between evidence and practice (Graham et al., 2006). In order to strengthen the efforts against work-related crime in the Nordic region, effective common approaches are needed.

Knowledge transfer and exchange (KTE) is a collaborative approach that in this project has been used to gather practitioners' existing knowledge while promoting the exchange of expertise through dialogue. This approach is especially useful for synthesize existing knowledge, generate new insights to support the development of impactful interventions. KTE aims to deepen understanding of the problem and enable more effective, two-way knowledge sharing between researchers and practitioners.

Taking lessons from implementation research, this project utilised KTE to facilitate true change instead of only development of new knowledge through the following three pillars:

- **Knowledge translation:** Making research findings accessible and relevant for the practice field to accelerate the knowledge uptake of research for more effective approaches.
- **Knowledge transfer:** Including a process that allows for individuals and/or organizations to access and utilize essential information, making tacit knowledge into explicit knowledge and facilitating its wider access and use.
- **Knowledge exchange:** The mutual learning and co-creation between actors (practitioners, policy makers, researchers) to facilitate collaborative problem-solving, planning, producing, disseminating, and applying existing or new research in decision-making.

In practical terms, the presumptive end-users of this report have been closely engaged during the project: as sources of information, as a sounding board for project findings and as creators of project outputs. As regards sources of information, the project called together focus group discussions with key experts in all of the Nordic countries where key themes of the project were discussed. In addition, the project appointed an international reference group, consisting of practitioners and experts representing the five Nordic countries, the Åland Islands, and the three Baltic states. The reference group met

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

online twice during the course of the project. At the end of the project, five national Nordic multidisciplinary roundtables will be organised with key practitioners and policy makers to share and discuss the findings, tools and joint solutions. Finally, selected practitioners from the five Nordic countries have been involved in the creation of short best-practice videos for labour and social inspectors, social partners and policy makers aimed to enhance their skills to prevent and address work-related crimes and work environment risks. Next, we outline the methodological foundation of this report in more detail.

Focus group discussions with experts

THE KTE approach was put into practice through focus groups organised in all Nordic countries. Prior to the focus groups the main contextual themes were identified through desk research and background meetings with Nordic practitioners. In Denmark and Sweden, HEUNI organised two online focus groups in Teams, while in Iceland one online focus group was organised in Teams. In Finland one focus group discussion was organised in hybrid mode, taking place at HEUNI's premises and on Teams. In Norway, six focus group discussions were conducted by Fafo with two to four participants in each group. Participants in all focus groups included representatives from both civil society and public authorities, covering a broad range of institutions involved in addressing labour exploitation and work-related crime, such as the police, occupational safety and health authorities, labour market parties, civil society actors, and researchers.

The total number of focus group participants (excluding project staff) was 72 (see the table below).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Table 1. Number of focus group participants in the Nordic countries

	Focus group discussions and format	Number of focus group participants
DK	2 discussions, online 21.3.2025 28.3.2025	7+6=11 (1 participant participated in both discussions and is counted twice)
FI	1 discussion, hybrid 12.5.2025	11
IS	1 discussion, online 18.3.2025	10
NO	6 discussions, online 13.5.2025 16.5.2024 3.6.2025 11.6.2025 19.6.2025 30.6.2025	4+3+2+2+2+2=15
SE	2 discussions, online 25.4.2025 9.5.2025	13+12=25 (4 participants participated in both discussions and are counted twice)
Total		**72**

Participants were recruited through the project partners' existing networks, as well as from the project reference group, and invites were also extended to key organisations, which were asked to circulate the invite among their staff. The focus group discussions lasted 1–1.5 hour each.

Focus group participants agreed to the discussion being recorded and transcribed in advance. At the onset of each discussion, participants were notified that while Teams is a secure platform, it may not guarantee complete confidentiality and were therefore advised to refrain from sharing highly sensitive or confidential information during the discussions. Participants were also informed that their data will be stored for five years after the completion of the project, and that the data will be

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

stored in a protected manner, in accordance with national and institutional regulations.

The project was complemented by other simultaneously ongoing Nordic projects at HEUNI which made it possible to supplement the data with information drawn from several bilateral discussions with experts/practitioners in the Nordic region including email exchange with selected experts. Such meetings were held during trips to Denmark (27–28.2.2025) with representatives of Danish occupational safety and health authorities, the police, the Centre against human trafficking and a trade union, as well as participation in a national seminar on labour exploitation in Copenhagen; and Sweden (11–12.3.2025) with participation in two national seminars on work-related crime, one round-table discussion, and bilateral meetings with researchers. This information was used as background information and is not directly quoted or referenced in the analysis. Furthermore, this report utilises information collected in interviews with Swedish experts, carried out for a knowledge overview on labour exploitation, commissioned by the Swedish Gender Equality Agency (Jämställdhetsmyndigheten 2025a). Participants in those interviews were informed about the use of the data and gave their consent for using the information in this report.

All focus group discussions were transcribed and coded based on themes discussed. When the focus group discussions and the previous interviews are used in the analysis, they are referred to by the affiliation of the expert and the country in question. Any quotes have been pseudonymised to ensure confidentiality of respondents and participants. In this report, any quotes have been presented in such a way that no individual views or findings can be linked to individual persons. Only the organisational affiliation of the interviewee is mentioned, together with the country of the respondent. The quotes serve as illustrative examples in addition to previous literature and reports which are covered in connection with the empirical findings. In addition, towards the end of the project, the research findings were discussed and validated in final round table discussions in each of the five participating countries. Where relevant, some of these discussions are also referenced in the text.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Part I

Setting the scene – literature and background

This part of the report provides a literature-based overview of the background to and development of policies and approaches towards what is now known as work-related crime in the Nordic region. Readers primarily interested in the empirical findings may proceed directly to Parts II and III.

Context

From social dumping to work-related crime: do these broad concepts sufficiently consider victims of labour exploitation and contribute to their identification?

THE NORDIC countries have applied different concepts to address labour market breaches and crimes in the labour market. The concepts include social dumping, work-related crime, economic crime, and also human trafficking. These conceptual differences influence policies and practices, including resource allocation. Ultimately, the different approaches have resulted in divergent, and sometimes inconsistent responses, at the Nordic level.

The concept of social dumping has been used in the Nordic region to describe practices where migrant workers are paid less than local workers, and work in poorer employment conditions. There is however no clear, universally accepted definition of the term (Kiss 2017). Social dumping has both been

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

used to describe the fear that a cheaper workforce from Eastern European countries would enter the labour market in conjunction with the EU enlargement in 2004 and 2007, as well as by the trade union movement to oppose the negative effects of EU integration (Iossa & Persdotter 2021).

As of 2013, the concept of social dumping has especially in Norway, and later also in Sweden, been largely replaced by the term work-related crime ('arbeidslivskriminalitet') in political and media discourse on labour exploitation (Jahnsen, Gjesdal & Andersen 2022; Brunovskis & Ødegård 2019, 47; Jönsson, Schoultz & Jahnsen, forthcoming). The Norwegian government introduced a national strategy against work-related crime in 2015, which defines it as "actions that violate Norwegian laws on wages and working conditions, social security, taxes, and fees, often carried out in an organised manner, exploiting workers or distorting competition and undermining societal structures" (Regjeringen 2015, 5). Work-related crime is thus a broad and non-legal concept that includes both labour-related and financial crimes. The Norwegian definition of work-related crime also includes labour exploitation, forced labour, and trafficking in human beings for labour exploitation, as well as social dumping, (Handlingsplan mot sosial dumping og arbeidslivskriminalitet 2025). The cost of work-related crime to society in Norway is estimated to be 2.4–9.3 billion euros a year (Eggen et al. 2017).

The concept of work-related crime was introduced in Sweden in 2017 when the government mandated eight authorities with the task to develop multiagency actions to counteract work-related crime (Riksrevisionen 2020, 68). Sweden quickly adopted the Norwegian approach on work-related crime, establishing several structures. In 2021, the Swedish government established the Delegation Against Work-Related Crime (SOU 2022), and in 2022, the government introduced a national strategy comprising 45 measures aimed at combating work-related crime (Regeringskansliet 2022).

The Swedish Delegation against work-related crime has defined this type of crime as "qualified practices that violate provisions in laws and agreements related to working life". Particular consideration should be given to whether the practice involves the exploitation of workers, distorts competition, is carried out in an organised or systematic manner, or is of a serious or extensive in nature (SOU 2025, 84). The Delegation point out that assessing the extent of work-related crime in Sweden is challenging, as it largely involves hidden practices

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

(SOU 2023, 110). The final report of the Delegation against work-related crime (SOU 2025) underscores that the prevalence and extent of work-related crime vary significantly across different industries. In Sweden, authorities assess that construction, cleaning, restaurants, transport, beauty services, and green industries have a high incidence of work-related crime (ibid., 110). Other typical sectors include car care, tire changing, certain transport services such as moving and home deliveries, snow removal, and waste management. In addition, agriculture/livestock farming, gardening (horticulture), laundry/dry cleaning, au pair work, and health and social care (for example personal assistance, primary healthcare, and home care) have been identified as potential risk sectors. (Ibid.) The industries identified by authorities as high-risk for work-related crime are also those that employ many individuals belonging to risk groups for labour exploitation (SOU 2023, 110). The criminal economy in Sweden is estimated to generate 100–150 billion SEK in criminal profits per year, with tax evasion accounting for a significant portion, close to 100 billion SEK per year (SOU 2025, 104).

In Denmark, the concept of social dumping continues to dominate public discourse (Spanger et al., 2024, 13; Regeringskansliet, 2023, 246–247). Social dumping has not officially been defined, but in Denmark it is used to describe cases where working conditions and wages are lower than they should be in the country and the employer does not pay sufficient taxes (Regeringskansliet 2023, 246–247). Thus, social dumping seems to be the predominant concept used to describe a broad range of actions that include everything from unfair competition to the lowering of wages and poor working conditions (SOU 2023; Andersen & Pedersen 2010; European Parliament 2016).

A recent report outlines that there is a risk of social dumping in one fifth of the companies in Denmark that employ foreign workers, and more than one-third of foreign workers in Denmark may be exposed to social dumping in these companies (Pejtersen et al, 2025, 8). In 2023, the Danish government adopted an "Agreement on a future-proofed working environment and efforts against social dumping"[1], which outlines priorities for the Danish Working Environment Authority's efforts in 2023–2026. The Agreement has a special focus on social dumping, and actions include intensified supervision and contractor shutdown, including blacklisting companies from public tender, the establishment of a multiagency

1 Agreement on a future-proofed working environment and efforts against social dumping | Danish Working Environment Authority.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

action team aimed to work with serious and complex cases, and publishing data from company-specific inspections and decisions from the Danish Working Environment Authority (Beskæftigelsesministeriet 2024).

Since 2012, the Danish Working Environment Authority, the Danish Tax Agency and the police have collaborated to counteract social dumping. A special task force was established in 2023 as a result of the new Agreement, consisting of representatives of the same three authorities (discussions with the Task Force in Copenhagen 27 February 2025). In July 2025, the Working Environment Act was amended to increase fines and halt work for the main contractor and subcontractors on a building site if orders to rectify illegal working conditions are repeatedly ignored (Preisler 2025a). Two new laws have been adopted in Denmark to strengthen efforts against social dumping and protect foreign workers from exploitation. Law L14 introduces requirements for employer-provided housing, ensuring it meets existing Danish standards. The Danish Working Environment Authority will have the power to issue orders and fines for non-compliance. (Lovforslag L14 2024.) Law L15 enhances controls against irregular labour by allowing authorities to require valid identification during inspections and obliging foreign employers to upload service agreements, employment contracts, and residence/work permits in the RUT register when posting third-country nationals (Lovforslag L14 2024).

In 2025 a nationally representative survey conducted by the Danish Building Trades Association with 2,000 respondents found that 83 percent of Danes agree that underpayment and exploitation have no place in Denmark, and 78 percent think cheating and exploitation should be punished more severely. However, the survey also revealed that fewer than half of respondents understood the term “social dumping,” indicating a need for clearer communication on the issue. (Teknisk LAndsforbund 16.9.2025.)

In Iceland the concept of social dumping has also predominantly been used as a way to frame crimes in the labour market. A working group was set up in 2018 by the Ministry of Social Affairs to combat social dumping (GRETA 2023, 35). In 2019, another working group was appointed to develop a legislate framework to combat social dumping in the domestic labour market. The working group prepared a draft law and submitted it to the Parliament, but it was not adopted because of strong opposition from trade unions who found the draft too lenient

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

(ibid.). In 2023, the working group reconvened to revise the bill and propose amendments (Althingi 2024). The purpose of the bill is to strengthen cooperation between supervisory bodies and enhance policy on measures against criminal activities in the labour market (ibid.). Amendments to the Act on Workers' Terms of Employment and Compulsory Pension Insurance (No. 105) entered into force on 1 January 2025. Based on the Act, co-operation committee on measures against criminal activity in the labour market began its work in 2025 (Government of Iceland 2025).

In Iceland, the term "criminal activity in the labour market" is used similarly to work-related crime. According to the Icelandic Confederation of Labour (ASÍ) this type of activity includes, for example, wage theft (including underpayment and non-payment of wages and overtime, holiday and other extra pay, exploitation of volunteer work, deduction of unjustified costs), violations of collective agreements, violations of workplace safety, poor working conditions, discrimination, forced labour, and labour trafficking (Alþýðusamband Íslands 2019). Moreover, the Confederation uses the term wage theft in a broad sense, in cases where an employer intentionally or through culpable negligence fails to respect the minimum rights of employees and seizes money and/or rights that the employees have earned through their work and that do not rightfully belong to the employer (ibid., 25).

In Finland, the phenomenon of labour exploitation was identified in the early 2000s. Official programmes and strategies were created that drew attention to the poor working conditions of migrant workers and also emphasised the links between exploitation and the grey economy in certain sectors (Ollus & Alvesalo-Kuusi 2012). For instance, in the first action plan against trafficking, combatting labour exploitation was mentioned in connection with action against illegal work, and the exploitation of migrant workers was seen as a specific problem of the grey labour market, especially in the restaurant and construction sectors (Ministry for Foreign Affairs 2005). Labour exploitation was associated with the grey economy, and the exploitation was found to take place in domestic work, self-employment, services and in the construction, cleaning, logistic, metal and hotel sectors (Sisäasiainministeriö 2008). More recent action plans against human trafficking and for tackling the grey economy have stressed the importance of preventative measures (Ministry of the Interior 2017; Roth & Luhtasaari 2021). Risk sectors identified by authorities and practitioners

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

include, i.a., the restaurant, construction, cleaning and agricultural sectors, as well as wild berry picking (Jokinen et al. 2011, 2023; Ylinen et al. 2020).

The Finnish government has used the concepts of economic crimes and the grey economy to capture the broader context in which labour exploitation and human trafficking for forced labour take place (Ollus & Alvesalo-Kuusi 2012). This reflects a recognition that crimes in the labour market pose both a threat against the state in the form of economic crimes, and a threat against the workers and their rights (ibid.; c.f. Spanger et al. 2024). In Finland, the term "labour exploitation" is commonly used in situations where the minimum terms and conditions of employment are not applied, and the perpetrator takes advantage of an employee in order to achieve financial gain. Adherence to labour legislation, including the monitoring of the use of migrant labour, is overseen by labour inspectors. Labour inspectors have the duty to notify the police, if they suspect that an employer is, for example, engaging in extortionate work discrimination or trafficking in human beings (Act on Occupational Safety and Health Enforcement and Cooperation on Occupational Safety and Health at Workplaces 44/2006). Trade unions have the responsibility to supervise compliance with all-binding collective agreements, and in certain sectors such as construction, are entitled to carry out workplace inspections. Trade unions have had a complex stance towards migrant workers, however, in particular if they do not belong to a trade union, due to a fear of social dumping, i.e., that migrant workers diminish the rights of union members (Alho 2012; Ristikari 2012).

While this report mainly focuses on the Nordic countries, it is important to note that labour exploitation has in recent years also become a key concern in the three Baltic countries. However, contrary to the Nordic countries, the Baltic countries are a source, transit and destination country for labour exploitation victims. Workers from the Baltic region have been exploited e.g., in Western and Northern Europe, including in Norway, Sweden, and Finland (Eurostat 2023). National policies to address work-related crime and exploitation in particular, thus need to consider the dimensions of prevention, oversight and sanctions both concerning crimes taking place in the country of origin but also affecting its nationals in other destination countries.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

How does labour exploitation manifest in the Nordic and Baltic context?

INTERNATIONAL LEGAL instruments do not include an exact definition of labour exploitation. In the context of the European Union, severe exploitation in all its forms refers to the violation of Article 1 of the EU Charter of Fundamental Rights, stating the inviolability of human dignity, and of Article 5 providing for the prohibition of slavery and forced labour as well as deprivation of rights under Article 31 on fair and just working conditions. The EU Fundamental Rights Agency (FRA) defines severe labour exploitation as

> **"Work situations that deviate significantly from standard working conditions as defined by legislation or other binding legal instruments, concerning in particular remuneration, working hours, leave entitlements, health and safety standards and decent treatment, and which are criminal under the legislation of the EU Member State where the exploitation occurs. Hence, severe labour exploitation includes at a minimum coercive forms of exploitation, such as slavery, servitude, forced or compulsory labour, and trafficking prohibited by Article 5 of the EU Charter, as well as severe exploitation within the framework of an employment relationship, as covered by Article 9 (1) of the Employers Sanctions Directive."**

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

The exploitation of migrant workers can be understood as existing along a continuum, encompassing a range of practices from less severe forms to the most extreme (e.g. Andrees 2008). At the most serious end of this spectrum, the exploitation may meet the legal definitions of trafficking in human beings or human exploitation, while other cases may be qualified as administrative offences, violations of the labour laws or as wage disputes. Migrant workers may find themselves at different points along this continuum, experiencing varying degrees and forms of labour exploitation over time.

Labour exploitation often begins with recruiting victims with false promises of well-paid jobs in seemingly legal work relationships (EUCPN 2023, 15). The worker may then be manipulated and forced to stay in the relationship by threats, physical violence and by withholding travel documents. Some phenomena seen in exploitative working conditions are bogus self-employment (person declared as self-employed when they fulfill conditions for employment relationship) and posted work (an employee is sent to a different EU member state than where they usually work) (EUCPN 2023, 17–18).

The business model of labour exploitation entails intentional acts by the employer committed for financial benefit. This business model typically relies on two main strategies: cost reduction and revenue generation. Cost reduction involves minimising labour expenses by underpaying or not paying workers, extending working hours, neglecting safety standards, and evading taxes and social contributions. Revenue generation includes charging workers recruitment fees and inflating costs for essentials like transport, housing, food, and equipment. This often leads to debt and increased dependency on the employer or exploiter (Allain et al. 2013; CSD 2019; Jokinen & Ollus 2019). Employers and perpetrators are increasingly camouflaging their activities as law-abiding, hiding from authorities with planned bankruptcies and switching between enterprises (ELA 2024, 2).

Overall, labour exploitation remains underreported within Europe (Pekkarinen et al. 2023). The identification of cases varies significantly also in the Nordic countries. There is no easily accessible and comparable information on the extent of cases of labour exploitation that would have been classified as criminal offences, such as human exploitation, extortionate work discrimination or wage theft depending on the national legislation, or which would have been classified for example as labour law violations, administrative issues or dealt as wage claims.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

The best source of comparable information is therefore human trafficking statistics, as most countries in the region regularly collect and publish data on the number of supported victims.

Human trafficking for the purpose of forced labour

HUMAN TRAFFICKING IS a serious crime and a violation of human rights. Human trafficking was criminalised in Denmark and Sweden in 2002, in Norway in 2003, in Finland in 2004 and in Iceland in 2009. The crime of trafficking incorporates different purposes of exploitation, and depending on the national legislation these include e.g., sexual exploitation, forced labour, forced begging, forced criminal activities, and other inhumane conditions. In most of the Nordic countries, governments initially paid attention to human trafficking for sexual purposes, with forced labour receiving less attention (Spanger et al. 2024). In the Nordic region, forced labour has not been criminalised as a separate offence, but is included as a form of exploitation in the crime of human trafficking. Forced labour refers to "all work or service which is extracted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily" (ILO's Forced Labour Convention no. 29 from 1930). In practical terms, forced labour can be a situation where e.g., a person is deceived, is isolated, physically or sexually violated, threatened, is not receiving wages, has his/her passport taken away, endures abusing working conditions and excessive overtime (ILO 2012). Parallel offences are sometimes used to process cases of labour exploitation in which the elements of trafficking cannot be proved. These include extortionate work discrimination in Finland, human exploitation in Sweden and Denmark and wage theft in Norway.

IN FINLAND forced labour has for many years been the most common form of human trafficking registered by authorities. In 2024, a total of 207 new clients were admitted to the National Assistance System for Victims of Trafficking, of whom 45% were victims of forced labour. The majority of those exploited for their labour had a residence permit in Finland (67%) and only 9% had no legal right of residence in Finland. (National Assistance System 2025.) Also, in Sweden the number of identified victims of labour exploitation has increased in recent years. In 2023, for the first time, more victims of labour exploitation

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

(189 persons) were identified than victims of trafficking for sexual exploitation (182 persons). The trend continued in 2024, with 233 victims of labour exploitation identified (compared to 166 victims of sexual exploitation), with the majority working in the hotel and restaurant industry, construction and the green sector. (Jämställdhetsmyndigheten 2024.) The increase in identification of labour exploitation is likely a result of increased efforts to address the crime, rather than an indication of an increase in volume (SOU 2025).

In Norway, a total of 183 adult presumed victims of human trafficking received assistance from accommodation and/or follow-up services in 2024, of which 56 persons were exploited in forced labour or services. (KOM 2025, 54.) Labour exploitation mainly occurs in construction, transport, hospitality, car repair/detailing, cleaning, and agriculture. Indicators of forced labour include low or unpaid wages, degrading living conditions either at the workplace or in employer-provided housing, and violations of working time regulations. In several cases, the employer or facilitator controls the workers' bank accounts. There is also information suggesting that employers threaten workers with dismissal and deportation if they contact the police or other authorities. (KOM 2025, 75; 77.) In Denmark, 78 victims of trafficking were identified in 2024. 25 people were exploited for forced labour, including eight women and 17 men. The majority were exploited in restaurant work, agriculture, cleaning, or construction. In most years, forced labour has been the second most common form of exploitation among detected victims after sexual exploitation. (CMM 2025).

In Iceland, according to statistics collected by the Bjarkarhlíð Family Justice Centre, which has been responsible since July 2020 for co-ordinating support services for trafficked persons, between July 2020 and September 2022, 25 presumed victims of human trafficking were provided with assistance. The majority were presumed victims of labour exploitation (17). Labour exploitation of migrant workers, including asylum seekers and refugees, is reported to take place mainly in the construction, tourism and catering sectors, as well as in volunteer work (GRETA 2023, 9). According to a 2023 report by the Icelandic Confederation of Labour (ASÍ) regarding labour market violations 58% of wage claims were made for union members of foreign origin, who made about a fifth of the Icelandic labour force in 2022 and a quarter of the members of the unions that submitted claims to the Confederation (Alþýðusamband Íslands 2023). The most serious abuse uncovered in ASÍ's

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

workplace inspections in 2022 concerned individuals from outside the EEA with temporary work permits (ibid.).

The Baltic countries are both a source, transit, and destination country for labour exploitation, and for human trafficking (Pekkarinen & Jokinen, 2023). In Latvia, labour exploitation concerns in particular third-country nationals (e.g., from Central Asia, Moldova, Ukraine, and India) working in construction and hospitality. A total of 90 third-country nationals were identified between 2016–2024. Latvian citizens are exploited outside the country e.g., in construction, agriculture, manufacturing, and hospitality. Local vulnerable groups include people with substance abuse issues, homeless individuals, and socially disadvantaged persons, as well as minors in institutional care or special education programs. (Par Cilvēku tirdzniecības novēršanas plānu 2025–2027.) Both Estonia and Lithuania show similar trends with nationals exploited abroad and third country nationals exploited in the country. In Estonia, only two victims of labour trafficking were officially identified by authorities in 2023 (U.S. Department of State 2025). In Lithuania, 18 third country nationals, mainly from Central Asia were identified as victims of trafficking for forced labour in 2024. Most of these individuals were exploited in the transport sector. (Lietuvos Seimo Kontrolieriai 2025.)

Next, we outline the linkages between exploitation and broader occupational safety and health issues.

Interlinkages between work environment risks, occupational health and safety and labour exploitation

THIS PART explores the complex interconnections between work environment risks, occupational health and safety (OHS), and labour exploitation on the basis of short overview of previous literature. It begins by defining work environment risks and examining how they are regulated and monitored. The discussion then turns to the specific vulnerabilities faced by migrant workers, who often encounter heightened exposure to poor working conditions. The final chapter addresses the negative health consequences that arise from exploitative labour practices.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

What are work environment risks and how are they regulated and monitored?

WE FIRST outline what is meant by occupational safety and health, and how Nordic countries attempt to regulate and oversee such questions. The International Labour Organization (ILO) defines occupational safety and health (OSH) as all aspects of health and safety in the workplace, where a safe and healthy working environment is one where risks are eliminated or when all reasonably practicable actions have been taken to reduce risks to an acceptable level and where prevention has been integrated as part of the organizations culture. ILO further groups workplace hazards and risks into biological, physical, and chemical hazards, ergonomics, psychosocial factors, and radiation (ILO n.d.).

In the context of European Union, Treaty on the Functioning of the European Union outlines several measures which EU Member States have to adopt to improve working environment to protect workers' health and safety as well as working conditions and social security and social protection of workers (Article 153). The European Framework Directive on Safety and Health at Work (Directive 89/391 EEC) guarantees minimum safety and health requirements throughout Europe while Member States are allowed to maintain or establish more stringent measures. The right to a healthy and safe workplace is reflected in principle 10 of the European Pillar of Social Rights, while principle 5 outlines that all workers have the right to fair and equal treatment regarding working conditions, access to social protection and training and principle 6 ensures that workers have the right to fair wages that provide for a decent standard of living (European Commission n.d.). Turning to the Nordic countries, the Finnish Occupational Safety and Health Act (738/2002) regulates workplace safety, outlining employers' responsibilities to ensure a safe working environment by assessing and managing risks (§ 8, § 10). This includes physical factors such as noise and temperature (§ 39), psychosocial risks like unfair treatment and threats (§ 27, § 28), work procedures, machinery, and tools (§ 12, § 14), and the use of personal protective equipment (§ 15). Additionally, employers must conduct continuous risk assessments and take necessary preventive measures (§ 10, § 11). The labour inspectorate enforces this law through inspections and guidance to ensure compliance.

The Swedish Work Environment Act (1977:1160) aims to ensure a safe, healthy, and sustainable work environment. It places primary responsibility on employers to prevent

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

ill-health and accidents (Ch. 3, § 2), requiring systematic planning and control (§ 2a). Chapter 2 outlines standards for work premises, air quality, lighting, noise, machinery, protective equipment, hygiene, meals, rest, and first aid. The Swedish Work Environment Authority (Arbetsmiljöverket) identifies indoor risks such as cramped spaces, uneven floors, poor stair design, inadequate exits, poor ventilation, insufficient cleaning, and unsuitable materials that may trigger asthma or allergies. Additional risks include bad lighting that causes fatigue and high noise levels that impair hearing and concentration (Arbetsmiljöverket 2024a.)

In production, logistics and industry, risks are different. In construction work, for example, work environment risks are listed into physical work environment risks, strain injury risks, organisational and social work environment risks as well as chemical and biological work environment risks (Arbetsmiljöverket 2024b). The physical risks can include the risk of falling or landslides, falling objects and machinery accidents (Arbetsmiljöverket 2023a). Strain injury risks can occur when working, for example, in small spaces such pipes and installation passages, not using lifting equipment for heavy things, handling heavy machinery and tools. (Arbetsmiljöverket 2024c.) Overall, organisational and work environment risks include stress, threats and violence that occur at the workplace (Arbetsmiljöverket 2024d). Chemical and biological work environment risks can include, for example, asbestos, stone dust, plastics, and chemicals in building products such as paint (Arbetsmiljöverket 2023b).

In Norway, work environment risks are defined through the Working Environment Act that outlines requirements of a safe work environment which are monitored by the Norwegian Labour Inspection Authority (Arbeidstilsynet). Key aspects of the act include physical factors such as noise and chemicals and psychosocial factors such as harassment and stress. Employers are required to assess these risks and intervene when necessary. (Working Environment Act 2005.)

Similarly in Denmark, the Working Environment Act sets outs the standards which are monitored by the Work Environment Authority (Arbejdstilsynet 2021). The law is laid down in executive orders which regulate across sectors, for example, the executive order on the performance of work, or specific sectors, for example, the building and construction industry (Workplace Denmark n.d.-a; n.d.-b).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

In Iceland, the Act on Working Environment, Health and Safety in Workplaces (No. 46/1980) applies to all workplaces with employees. Employers are responsible for ensuring a safe and healthy work environment, conducting risk assessments, and implementing preventive measures. Administration of Occupational Safety and Health (AOSH) supervises compliance of employers with the Act, conducts inspections, provides training, and enforces regulations. (The Administration of Occupational Safety and Health n.d.)

As shown above, OSH questions are strongly regulated in the Nordic countries. OSH issues are also closely linked to work-related crime in that breaches against OSH can be a crime, and similarly, insufficient OSH considerations can point to broader problems in the workplace and can create a foundation for work-related crimes. Nordic criminological research has noted a definitional shift from considering OSH incidents as accidents to seeing them as crimes (Estrada et al. 2014). At the same time, however, OSH breaches tend to be deprioritised by law enforcement actors (Alvesalo-Kuusi et al. 2014; Kyynäräinen 2023). This raises questions as to how OSH that concern migrant workers in particular are addressed and understood. Next, we will provide an overview of how OSH issues relate to migrant workers.

What are the risks faced by vulnerable migrant workers?

THE INTERNATIONAL Labour Organisation ILO defines vulnerable groups of workers as workers who due to a factor such as country of origin, gender, age, migrant status, disability, race, or ethnic origin are more vulnerable to being discriminated, subjected to unlawful practices, labour exploitation, poor working conditions, and precarious employment (ILO 2022, 1).

Some migrant workers may find themselves in the lower tiers of the labour market, characterised by uncertainty and poor working conditions.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Because the (poor) working conditions may still better than in their country of origin, this creates a 'dual frame of reference' where migrant workers assess their working conditions against those in their country of origin (Piore 1979; Magaña Lopez & Rye 2024). Vulnerabilities – including economic dependency, a lack of awareness of rights, a lack of other options, as well as immigration status and discrimination – also contribute to why migrant workers may be more willing to work despite the poor terms (see e.g., Ollus 2016a; Murphy, Doyle & Thompson 2022).

Migrant workers are often hired to do jobs that are not favoured by native-born local labour force. These jobs are so-called ''3D jobs'' referring to the words dangerous, dirty, and demanding or degrading (ILO 2022, 1; Porru & Baldo 2022, 1). These jobs often include poor safety standards, reduced availability of personal protective equipment and lack of information on safety matters. Migrants often tend to work in environments where they are affected by high temperatures, loud noises and vibrations, maintenance of an upright position for long periods, faster work rates and increased exposure to pesticides and chemicals (Porru & Baldo 2022, 2). Migrant workers may face fewer or more limited opportunities to cool down and recover. They may face high demands: they may be assigned the most physically demanding tasks and may be forced to work at a high pace and with a heavy workload (MYNAK 2024, 8).

CASE EXAMPLE

Fatal Accident at Danish Biogas Plant

IN 2024 ACCIDENT at the Flemløse Biogasanlæg plant on Funen, Denmark, claimed the lives of two Romanian workers (aged 20 and 25). The incident occurred during roof casting on a silo. Six other workers, men aged 19 to 49 from Romania, Poland, and Belgium were also injured. The construction site had operated for over six months without a formal building permit, despite the municipality being aware of the situation. Media reporting concluded that such events underscore the vulnerability of foreign workers in Denmark's construction sector: although they represent a small share of the workforce, they are disproportionately involved in fatal accidents, often working long hours in high-risk tasks. (DR 28.11.2024; DR 30.11.2024.)

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

MOREOVER, WORKPLACE hazards can present themselves as psychosocial and physical. For migrant workers, these can include, for example, uncertainty about the future due to unclear terms on contract renewals, injuries from having to rush at work, being dismissed after sustaining injuries at work, and experiencing verbal and physical abuse. Additionally, lack of personal protective equipment and training and not getting enough rest are aspects affecting working environment safety for migrant workers (Boufkhed 2020, 224).

According to a systematic literature review conducted by the Swedish Agency for Work Environment Expertise MYNAK (2024), work-related crime affects the work environment for workers in many ways.

Regardless of their gender or the industry in which they work, workers are exploited in various ways, and there are many deficiencies in their work environments which are marked by high demands and low influence.

High demands include physically strenuous work, a high pace and workload, long shifts, and few or no breaks or days off, which result a sense of exclusion and isolation from the rest of society. Workers have low control and minimal influence over their work, with few or no opportunities to impact anything within their place of work. Men and women are exposed to different risks. In male-dominated sectors such as transport, and construction, risks often relate to safety. Moreover, lack of skills and experience, negative attitudes towards safety regulations, and poor language skills are factors that can increase the risk of injury. In female-dominated occupations, such as healthcare, social care, hospitality, and catering, workers are also more frequently subjected to sexual harassment.[2]

The 237 exploited migrant workers interviewed by European Union Agency for Fundamental Rights (FRA 2019) reported frequently working in hazardous environments without personal protective equipment (PPE) which exposed them to significant incident risks. One worker recalled working ''endless hours'' without payment or with little pay in

2 sawee.se/the-impact-of-work-related-crime-on-the-work-environment.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

dangerous settings without safety equipment. The workers had also endured extreme weather conditions such as extreme heat without adequate protection, and they mentioned that the work environment sometimes got worse over time (FRA 2019, 47–48). It was common to work long working hours without adequate breaks or holidays. Risks in the work environment can affect the health of employees, which in turn, when threatened, can increase the risks of work accidents. These workers reported living in substandard accommodations with no basic amenities like toilets or running water (FRA 2019, 41–42). The workers also faced physical and psychological abuse and lacked legal protection due to the fear of losing wages or deportation (FRA 2019, 19).

Another study on Latin American migrant workers in low-skilled jobs in London identified three key employment issues: 1) poor conditions, 2) disposability of workers and abuse of power, and 3) health and safety hazards. Poor conditions included irregular payments and unclear contracts (Boufkhed et al. 2024, 6–7). Disposability and abuse involved threats, lack of respect, and sexual harassment, affecting workers' ability to complain. Health and safety hazards included lack of PPE, poor health benefits, inappropriate tasks for pregnant or injured workers, and psychological abuse (Boufkhed et al. 2024, 10–13).

Moreover, a systematic review by Alzoubi, Locatelli and Sainati (2023) examined the literature on modern slavery in construction projects. Modern slavery was defined as workers being exploited by their employers to work by being threatened, controlled by abuse or intimidation, treated as commodities and physically controlled or restricted (Crane 2013, 50–51). The review listed structural conditions that make construction projects especially prone to modern slavery. The seasonal nature of construction work and delays of the projects increase the risk of exploitation due to extensive hours with limited breaks and temporary work relationships. High percentage of workers are low-skilled and migrants who due to socioeconomic difficulties may rely more on self-employment agencies, which increases the risk of exploitation. Construction sector has a low-profit margin and a push to cost-saving but is not fully rigorous about labour standards, leading to unethical practices. Additionally, supply chain transparency is limited, and supply chains can be complex, so governing transactions can be challenging. Construction sites are dependent on flexible labour force moving between locations (Alzoubi, Locatelli & Sainati 2023, 19–21).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

CASE EXAMPLE

Workplace accident at a construction site in Sweden

ON 11 DECEMBER 2023, a temporary construction elevator collapsed at a building site in Sundbyberg, near Stockholm. The elevator fell approximately 20 meters, killing five workers instantly. The deceased included migrant workers from Russia, Ukraine, and Afghanistan, and one Swedish worker. All of them were employed through subcontractors. (SVT Nyheter 12.12.2023; SVT Nyheter 13.12.2023.) The Swedish Accident Investigation Authority launched an inquiry which revealed that critical fasteners (in the elevator mast) were missing, which caused structural failure. Safety inspections were inadequate, although the elevator type has been in wide use in Sweden. (SVT Nyheter 12.12.2024.) In the autumn of 2025, the Swedish Prosecution Authority informed that a CEO and two elevator installers were charged with workplace safety violations because of gross negligence: the installers failed to mount all four load-bearing screw connections between elevator mast sections, causing the collapse. The Swedish Work Environment Authority's inspection regulations were not followed, and no self-check was performed. The CEO was also charged for failing to ensure proper routines and documentation for safety checks. Prosecutors argue that correct assembly or compliance with inspection rules would likely have prevented the accident. A corporate fine of seven million kronor is also being sought. (Åklagarmyndigheten 29.8.2025.)

MIGRANTS ARE also at a heightened risk of exploitation and frequently face serious health consequences due to both risky work environments and exploitation (Benach et al. 2011; Moyce & Schenker 2018; Schenker 2010). The negative health consequences of labour exploitation and human trafficking are a global public health problem (Zimmerman & Kiss 2017).

In most receiving countries, migrants often also lack health insurance, are young, poor and have low education levels (Schenker 2010, 2). Fatal and non-fatal injuries at work are more common for migrant workers when compared to native populations (Schenker 2010, 1). Fear and discrimination and lack of health insurance can result in more hazardous work environments and housing for migrants (Schenker 2010, 7). Lack of social insurance has been listed as an indicator of trafficking of adults for labour exploitation (ILO 2009, 4).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

CASE EXAMPLE

Exploitation of stone workers in Finland

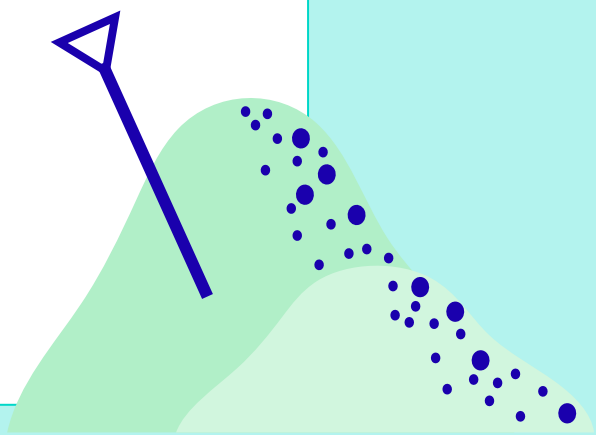
IN 2024, POLICE in Northern Ostrobothnia, Finland, found 14 Chinese stone workers working under conditions resembling forced labour. They worked under three companies. The employees were entirely dependent on their employer for food, shelter, and livelihood. They lived in unhygienic accommodation near the worksite, in sheds and chemical storage areas without clean water. Both living and working spaces were contaminated with stone dust. The workers also lacked protective equipment and faced serious safety hazards, including injuries from battery acid, falls, and cuts. They reportedly worked 9–12 hours daily, and the employer discouraged them from seeking medical care. (HS 31.10.2024; YLE 30.5.2023; YLE 4.7.2023.) The trafficking charges were acquitted by the Oulu District Court in early 2025, but the verdict is not yet legally binding. According to the District Court, the stone companies operating in Northern Ostrobothnia did not subject the stone workers to forced labour or otherwise degrading conditions. However, the court found that the two stone companies acting as their employers exploited the workers' dependent position in relation to the employer. (KSML 25.2.2025.)

BULLER ET al. (2015) explored exploitation and occupational risks among migrant workers in textiles, mining, and construction across Argentina, Peru, and Kazakhstan. Workers faced long hours, extreme temperatures, lack of protective equipment, and exposure to hazardous conditions, leading to injuries, respiratory and skin problems, infections, and chronic illnesses. Migrant workers also experienced psychological and physical abuse (Buller et al. 2015, 98–99). However, establishing causal links between job quality, working conditions, and mental health is difficult due to reverse causality and confounding factors. Using longitudinal UK data, researchers found that poor working conditions can negatively affect mental health, with women most impacted by factors such as schedules, commuting, physical demands, and environmental conditions (Belloni, Carrino & Meschi 2022).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Key findings from part I

- **Occupational safety** and health (OSH) issues, work-related crimes, and labour exploitation are closely interconnected.
- **OSH breaches** can form part of an overall business model of exploitation or serve as a precursor to further violations.
- **OSH breaches** often act as indicators of work-related crimes and exploitative working conditions.
- **Media reports** indicate that migrant workers in Nordic countries face an increased risk of workplace accidents and fatalities.
- **Nordic countries** differ in how they monitor and address the link between OSH and labour exploitation. These differences stem from the mandates, capacities, and roles of oversight bodies, particularly inspection authorities and trade unions. National strategies toward work-related crime and labour exploitation strongly influence practical approaches.



CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Part II

Institutional, Legal, and Structural Challenges in Tackling Labour Exploitation – empirical findings

This section of the report outlines the main identified structural shortcomings and problems on the basis of the empirical data collected in the form of focus groups and stakeholder meetings/interviews as well as on the basis of previous literature. The aim of the analysis is to understand the similarities and differences between the Nordic countries, and ultimately to transfer knowledge between the countries regarding promising practices and provide recommendations for further action.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Institutional Limitations

Do labour inspectorates have the mandate to monitor exploitation among migrant workers?

A KEY aspect of the Nordic model is that it is primarily the social partners, through collective agreements, who regulate the terms and conditions to be applied for work. In Finland, Iceland and partly also in Norway, sector-specific collective agreements are by law universally applicable also to those employers who are not members of employers' associations. In Sweden and Denmark non-member employers can apply existing collective agreements, and they often do, but compulsory extension is not possible in these two countries (Kauhanen 2025). This reflects the role of the state in the organisation of the labour market in the Nordic countries, in Finland there has historically been more state intervention than in Sweden (ibid.)

In Finland, the Finnish labour inspection authority has the mandate to oversee the terms of employment of all workers, regardless of union membership. There are specific inspectors who are specialised in monitoring the use of foreign labour in Finland. In 2024, of the total 20 600 inspections, 1700 inspections targeted the use of foreign labour (Työsuojelu 2025a). Inspections are targeted particularly at those workplaces where problems are most likely to occur, based on numerous tips which are received from other authorities, trade unions across different sectors, third-sector organisations, and private individuals. In 2024, the use of foreign labour was most frequently monitored in the hospitality and food service sector (38%) and the construction sector (18%). Inspections were also carried out in seasonal work (9%) and in manufacturing industries (7%). As in previous years, numerous problems were identified during inspections regarding compliance with the minimum terms of employment for foreign workers. Deficiencies were particularly common in relation to wages and were found in nearly half of the inspections. The issues varied in severity, ranging from the absence of evening shift allowances to cases of serious labour exploitation (Työsuojelu 2025b, 5–6).

Unlike Finland, Norway does not systematically verify foreign workers' right to work during inspections. Foreign labour are, however, recognised as a key risk indicator, and inspections are targeted towards high-risk sectors. In industries where HSE cards are mandatory, inspectors routinely check these cards during inspections (Weldehanna 2024). This means that control of foreign workers occurs more indirectly in Norway

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

and is not reported through the same type of specific metrics as in Finland. The five Service Centers for Foreign Workers (servicesentre for utenlandske arbeidstakere, SUA) reached some 190,000 foreign workers in 2024, providing them with guidance and information on their rights. SUA is a cooperation between the Labour Inspection Authority, the police, the Tax Administration and UDI, and its primary task is to provide information and guidance. In 2024, SUA received 2,080 inquiries, mostly concerning working hours, employment contracts and unpaid wages (Arbeidstilsynet 2025, 4; 129). An additional regulatory tool is the mandate of the Labour Inspection Authority to impose orders on employers to pay wages in sectors with an extended minimum wage. The Authority can also order the employer to pay for overtime. The employer also has to provide evidence that the wage arrears have actually been paid into the employee's bank account and may be handed an infringement fee for non-compliance (Haapasaari et al., 2024, 107–108).

Sweden and Denmark both have limited labour laws, which primarily apply to employment relationships not covered by collective agreements. Collective agreements regulate wages and working conditions, while issues such as the working environment and rights to holidays are regulated by law. Neither Sweden or Denmark has a statutory minimum wage nor official control of compliance with collective agreements unlike several European countries (Regeringskansliet 2023, 245–246).

The difference in how collective bargaining is organised and how it is applied explains many of the differences that can be seen in how the Nordic countries address the exploitation of migrant workers, as well as work-related crime in general.

One of the key differences in the Nordic region is whether the labour inspectorate/work environment authority has a mandate to oversee terms of employment and wages of workers, and in particular those of migrant workers in the country,

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

or whether this is the sole responsibility and remit of the labour market parties, i.e. most notably the trade unions. However, since trade unions mainly work with their members, non-unionised migrant workers risk falling outside the scope of oversight by trade unions (e.g. Moksnes 2016; Selberg & Gunneflo 2010; Mešić 2017; Bengtsson 2013, Schoultz & Muhire 2024). At the same time, they fall outside the scope of oversight by authorities in those Nordic countries where the labour inspectorate/work environment authority does not have a mandate to oversee working conditions, in particular salaries and working times.

Can occupational safety and health frameworks be used to uncover indications of labour exploitation when there is no explicit mandate to oversee salaries and working conditions?

ONE OF the key challenges especially in Sweden and Denmark is whether existing mandates of the work environment authorities on occupational safety and health could be used to identify indicators of exploitation within the framework of breaches of safety and health, even though the authority does not have an explicit mandate to oversee wages and working hours. Based on the Nordic focus group discussions and stakeholder meetings, in Denmark, and also in Sweden, there are different views on whether the work environment authority can at least informally ask migrant workers about their working conditions or salaries within their existing mandate on occupationally safety and health.

In discussions with Danish representatives of the work environment authority, there were slightly diverging opinions: formally the authority cannot ask about conditions that fall outside of direct questions of workplace safety and health, but informally, it seems that individual inspectors may ask questions such as “where are you employed, who is helping you with the documentation, where do you live, who has your passport” (Bilateral meetings with representatives of the Danish Work Environment Authority 27–28 February, 2025) . The work environment inspectors cannot ask about salaries but can e.g., ask “who pays your salary”, which may provide information about potential situations of exploitation. However, Danish representatives emphasised that whether the mandate of the work environment authority should be expanded is ultimately a question for the politicians, as it is currently strictly the

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

trade unions that have a mandate to oversee adherence with collective agreements in Denmark (ibid.; Danish focus group discussion).

Similar to Denmark, the Swedish Work Environment Authority does not have a mandate to oversee wages and terms of employment, as this is the sole responsibility of trade unions, which are responsible of overseeing the terms of employment of unionized workers. To tackle this, the Swedish Delegation against work-related crime has proposed that the instructions for the Swedish Work Environment Authority and the Swedish Tax Agency should state that these government agencies are to contribute to the work to combat trafficking in human beings and similar offences. Government agencies and the social partners should, according to the Delegation, engage in deeper consultations on "who is responsible for what when it comes to inspections of working conditions on the Swedish labour market." (SOU 2024, 38). However, rather than suggesting a broadening of the Work Environment Authority's mandate, the Delegation proposed the adoption of a new provision that would make it clear that the Work Environment Authority is permitted to inform the social partners of working conditions that may be relevant to their activities. The delegation also proposed establishing a web-based joint agency tip-off portal for reports of work-related crime. This would facilitate the sharing of such intelligence via social partners and enable the development of more effective joint measures and monitoring. (Ibid.).

In the Swedish focus group discussions, the question of who should oversee the working conditions of non-unionized migrant workers raised much debate. Practitioners agreed that there is a gap in oversight concerning migrant workers who are not members of trade unions, but just like in Denmark, there is a reluctance to propose changes to the established Swedish labour market model. However, participants raised both Finland and Germany as examples, where government actors – the labour inspectorate in Finland and the government-funded Arbeit und Leben -centres in Germany – have a mandate to oversee and support migrant workers. Some participants strongly argued that the current Swedish approach should be changed as there is a clear gap in the Swedish model.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

> **It is a sensitive issue for the Swedish model [...] there are a great many [migrant workers] who are in this black hole on the outside [of oversight], and they must clearly be included in the Swedish model. [...] But if you do that [give a formal role to government actors] in Sweden, then it means that you are, in a sense, stepping in from the state's side and taking part of the trade unions' share of the pie, or the work that the unions do, which could weaken the Swedish model, making it very sensitive.**
>
> — Government agency representative, Sweden, focus group discussion

A trade union representative in the same focus group discussion emphasised that if the issue is to be treated as significant, it requires a careful examination of the Swedish model of governance and labour relations. They pointed out the need to define the division of responsibilities between trade unions and public authorities and which tasks should remain within the unions' domain, which should be managed by the state, and what kind of resources the state would need to take on those responsibilities effectively.

Given these difficulties, it has been suggested that to ensure oversight of the working conditions of all migrant workers, the state should allocate financial support to the unions to monitor labour conditions among non-members (Schoultz & Muhire 2024). Alternatively, some of the responsibility for overseeing labour conditions should be shifted to state agencies (ibid.) The Swedish government has argued that the state's efforts should be strengthened without changing the fundamental roles of labour market parties and the state (Regeringens skrivelse 2020). Ultimately, this remains a political question for the labour market parties and the state to resolve.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Worker Representation and Mobilisation

Why do trade unions struggle to mobilise and support migrant workers?

THE NORDIC countries have traditionally had a high level of unionisation (Kjellberg 2025). As discussed previously, the trade unions oversee the working conditions and salaries of workers in both Sweden and Denmark. However, migrant workers present a challenge for the traditional trade union movement. On the one hand, the aim of unions is to protect their members, the local workforce and the local working conditions. On the other hand, they also have a responsibility towards global worker solidarity (see e.g. Alho 2012; Ristikari 2012). The unions are for their members, as one Danish representative pointed out.

> **We are not an NGO set into the world to save poor migrant workers being exploited, even though we sometimes act like that. We are here to help the organised workers get a safe work life. Sometimes we can help the migrant workers, but that is not our main issue.**
>
> — Trade union representative, Denmark, focus group discussion

Focus group participants in all Nordic countries agreed that efforts to support and oversee migrant workers should be strengthened, although views differed on the appropriate solutions and the role of trade unions in addressing the issue. For example, in Sweden, the established trade union movement is engaged in traditional organisation and cooperation with the authorities, while the more radical trade union movement actively engages with migrant workers and raises cases also publicly (see Schoultz & Muhire 2024). Although trade unions in the Nordic countries have begun organising migrant workers, many migrants may be reluctant to join due to negative experiences with unions in their home countries, a lack of familiarity, or simply the inability to afford membership fees. The unionisation of migrant workers remains difficult, and this creates a challenge for an oversight system specifically based on unionisation. Some respondents also argued that unions are also not necessarily very keen to engage with migrant workers.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

> **We find it very difficult to get the trade unions connected to the high-risk industries to take responsibility for this target group. They often require people to pay the membership fee before they can get involved in their cases, and many of these individuals have not received wages for months, so they simply do not have 250 or 500 SEK [22 or 45€] to pay.**
>
> — Swedish victim support authority representative, focus group discussion

Traditional unions have engaged with migrant workers to varying degrees in the Nordic countries, as evidenced by the focus group discussions. The unions themselves also emphasised, that it is not always easy to mobilise or reach migrant workers. (Stenseth Huseby & Ødegård 2024.)

What is the role of social partners in addressing labour exploitation?

THE NORDIC labour market model gives the labour market parties a significant role in overseeing the terms of employment, including wages. The mandate of the labour market parties is in particular, to engage in breaches of working conditions that fall under the remit of civil disputes, such as wage disputes. However, labour exploitation may range from underpayment to more serious forms of exploitation, which fulfil the elements of crimes (Jokinen et al., 2011). The threshold and boundaries between civil and criminal cases and the responsibilities of trade unions vs. authorities was discussed at length in the Nordic focus group discussion. As pointed out by Danish trade union representative labour unions need to move beyond a narrow focus on traditional disputes and engage in broader cooperation with authorities, as criminal exploitation cases require different expertise and joint strategies.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

> **One of the big problems is that when we see a worker, even though it is an obvious case of labour exploitation, we look at it as a labour dispute, because we are the ones who are dealing with that sort of stuff and because we are the ones covering it and the rules are the collective agreements.**
>
> — Trade union representative, Danish focus group discussion

It is not just the unions that claim these cases as not theirs, but also the authorities that push cases to the unions instead of addressing them as crimes to be handled by the authorities (see also Schoultz & Muhire 2023).

> **It is true that labour exploitation cases have often been treated as wage claims within the unions, while there are clear indications a lot more is going on. We've had many instances in last few years, mostly local police officers have told people to go to the union, even its clear it is much bigger problem than a regular labour dispute.**
>
> — Trade union representative, Icelandic focus group discussion

Danish counterparts noted that there has been very little attention paid to migrant workers and their exploitation in the Danish labour market. While cases of exploitation do emerge, they are rarely investigated. One reason for this is that the prevailing social dumping framework tends to frame the challenges faced by migrant workers primarily as labour and wage disputes rather than as criminal offences. However, when exploitation is treated as a crime and a violation of criminal law, it becomes a matter for authorities and law enforcement rather than trade unions. As participants in the focus group discussions pointed out, drawing the line between labour market issues and criminal matters is often difficult.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

> **We have several examples of the police not even taking down a report, referring to it as a labour market conflict and not a crime.**
>
> — NGO representative, Swedish focus group discussion

In Denmark, and in Sweden, the challenge seems to lie in what fulfils the elements of crime in cases of labour exploitation, whereas in Finland there are options to use criminal offences such as extortionate work discrimination and (aggravated) usury in cases of labour exploitation not amounting to human trafficking. In Norway, the provision of wage theft offers a possibility to define underpayment as a crime rather than as a civil dispute. Representatives of the work environment authorities in both Sweden and Denmark argued in the focus group discussions that it is challenging to place exploitation on a continuum from minor breaches to criminal exploitation, and to agree on who should be responsible for oversight. While this is no doubt an overall challenge, the ramifications are evident in particular in Sweden and Denmark, with the lower number of investigations and indictments of labour exploitation (see also Schoultz & Muhire 2023).



CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Legal Framing and Enforcement Failures

What are the differences in how labour exploitation is processed as a crime in the Nordic countries?

THE NORDIC countries differ greatly when it comes to the number of investigated, prosecuted and convicted cases of labour exploitation. Between 2000 and 2020, Finland had the highest number of criminal court cases on labour exploitation, and the largest number of convictions for trafficking for forced labour (9 convictions), followed by Norway (5 convictions) (Schoultz et al. 2023). Sweden had one prosecution for trafficking for forced labour until 2020, while Denmark had no convictions for human trafficking for forced labour (ibid.). Although the Nordic countries have similar legal norms concerning labour exploitation, and human trafficking in particular, the practice of applying the law differs, and is related to the understanding of what is considered a victim of labour exploitation, and how vulnerabilities are addressed (ibid.).

Criminal investigation requires significant resources to document working conditions, and it often takes a long time. Regarding investigation methods for labour exploitation, several Swedish police officers interviewed by Johansson (2024, 25) expressed that there is a lack of skills and knowledge on how to best investigate these cases. Some pointed out that the low minimum penalty for human exploitation means that police are unable to use the necessary coercive measures, making it difficult to collect evidence. There are also concerns about the fact that a police report solely related to unpaid wages does not fall within the crime of human exploitation but is considered a civil matter (Johansson 2024, 25). In our focus groups, a representative of an NGOs raised that while the police may investigate other crimes, such as economic crimes, they do not include crimes of exploitation in their investigation (NGO participant in focus group discussion 25.4.2025).

As outlined by Johansson (2024, 25–26) labour exploitation cases often involve complex economic, corporate and labour law issues that are difficult to investigate, especially retrospectively. Interviewed prosecutors noted that complex cases may also involve extensive material and many plaintiffs, and the use of interpreters makes it even more difficult. It can be challenging to determine how much salary a worker has received, as cash is often used, and sometimes written employment agreements are missing. An additional challenge concerns international circumstances, for instance, whether the

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

conditions for posted workers have been followed in the home country, or whether certain payments were made abroad, as receipts are often lacking. Another difficulty in investigating suspected labour exploitation in Sweden is that cases are sometimes transferred late from the police to prosecutors, and the police do not always know that the case should be handled by the specialised unit for international and organised crime (RIO, Riksenheten mot internationell och organiserad brottslighet). As a result, prosecutors specialised in human trafficking issues may become involved too late, which can weaken the investigation.

The Swedish Gender Equality Agency notes in their report the lack of support for victims of labour exploitation by Swedish authorities. They note cases where the police have refused to file criminal reports related to human trafficking and exploitation. Instead, the victim is referred to resolve the wage dispute through civil proceedings (Jämställdhetsmyndigheten 2025b, 43).

While the Gender Equality Agency does not have the mandate to work operationally with workplace inspections, they coordinate and co-finance, through agreements with municipalities and county administrative boards, so-called regional coordinators against human trafficking. Regional coordinators interviewed by Johansson (2024, 26) noted that in practice accessing national protection and support process requires that a preliminary investigation has been initiated, and that the worker has been granted a temporary residence permit. This makes it difficult for individuals to receive help and support when few investigations are initiated in practice. Regional coordinators also reported having difficulties determining what constitutes a punishable offense and expressed the need for clearer guidelines. Their reports of labour exploitation are often reclassified as other crimes, such as fraud or assault. The regional coordinators' experience is that few complaints are filed, and when preliminary investigations are initiated, they are often closed with little or no investigation. (Johansson 2024, 26.)

The lack of residence permits for victims for the duration of the criminal investigation was discussed also in the focus groups. Civil society actors criticised the lack of a rights-based approach and the very limited implementation of the reflection periods for victims,[3] and more generally the lack of a victim-sensitive approach.

3 According to international agreements, victims of trafficking are entitled to reflection periods of at least 30 days. This concerns also undocumented migrants who do not have a valid residence permit or right of work in the country destination.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

> **It is always the Aliens Act first, or detention first, or if it is a person who has a work permit, then their rights and rights-related measures are not applied. They say, "No, but if there is a work permit, then there is no reflection period, it's not needed or it cannot be applied for.**
>
> — NGO representative, Swedish focus group discussion

NGOs also criticise the lack of government responses to victims of exploitation, leaving much of the responsibility on civil society actors. Also government actors themselves raised the lack of support to victims of labour exploitation. This is not unique to Sweden, as the question of what to offer victims of labour exploitation who are not quite victims of trafficking has been discussed also elsewhere (Pekkarinen et al. 2021; Wintermayr & Weatherburn 2021) Furthermore, in situations where persons are offered residence permits, i.e. reflection periods, they are terminated once the authorities have received the information they need, leaving the victims in a position where they have to leave the country.

> **What we're seeing now is that these temporary residence permits don't actually last for six months – they're revoked immediately once a preliminary investigation is closed.**
>
> — Regional coordinator, Swedish focus group discussion

There is thus a clear need for strengthened support mechanisms, as well as enhanced multiagency cooperation in identifying and assisting victims of labour exploitation. Moreover, still too few cases of labour exploitation or work-related crime lead to convictions and penalties, according to Finnish focus group participants. Labour exploitation is often motivated by profit, and existing penalties are often insufficient to address this issue, especially in cases when the crime does not qualify as human trafficking (Jokinen & Ollus forthcoming; Schoultz & Muhire 2023; Wintermayr & Weatherburn 2021; Sjödin 2021, Jokinen et al. 2023). Often criminal entrepreneurs and unscrupulous businesses circumvent business bans by transferring their companies to other individuals' names, establishing new businesses, and evading their obligations in various ways (e.g. Pekkarinen et al.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

2021, 137.) Use of bogus or forced self-employment or utilising payroll companies help conceal exploitation from the authorities and diffuse responsibility among different actors (Jokinen & Ollus 2019). At the same time, authorities may not always make sufficient use of enforcement measures, such as asset seizures (e.g. Ylinen et al. 2020). A broader application of these measures would prevent criminals from hiding or transferring their assets elsewhere and ensure that criminal proceeds are better recovered (Ylinen et al. 2020).

The Swedish Work-Related Crime Delegation has proposed that in order to effectively address work-related crime, repeated non-compliance should result in harsher penalties than isolated incidents. Employers who exploit workers often do so systematically, violating multiple regulations. Therefore, it may be appropriate to apply progressive penalties in this area, ensuring that repeated violations are penalised more severely. Such administrative fines should be indexed to a greater extent than is customary today, which is best done in relation to the price base amount under the Social Insurance Code, otherwise the deterrent effect of the administrative fine will erode over time. (SOU 2025, 44.)

What is the role of the A-krim centers in processing work-related crimes and protecting the rights of exploited workers?

NORWAY ESTABLISHED its first A-krim centre in Bergen in 2014 (Norwegian Ministries 2019). This centre was built on a model developed in Stavanger in the years prior in which representatives of the police, the Labour Inspectorate (Arbeidstilsynet), the Tax Authority (Skatteetaten) and the Labour and Welfare Board (Arbeids- og velferdsforvaltningen) met regularly and coordinated their efforts through joint inspections. However, other authorities, such as the Fire Safety Authority, also cooperate with the A-Crime Centres. Currently, Norway has a total of eight A-krim centres. In addition, there is local A-krim cooperation without formal centress (A-krimsamarbeidet 2025.) In 2024 the A-krim centres carried out inspections in construction, hospitality, auto repair, cleaning, transport, fish processing, and seasonal work (A-krimsamarbeidet 2025, 11).

In the early years of the cooperation, there were challenges in the multi-authority cooperation, as agencies lacked a common understanding of work-related crime, which led to differences in approaches and goals. A revised, joint strategy was developed in 2019, and increased cooperation through joint

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

meetings and actions helped build mutual trust and common understanding (Norwegian Ministries 2019; Jahnsen & Rykkja 2020 6–7, 16; Pekkarinen et al. 2021). This shift also reflected in the focus group discussions.

> **Ten years ago, when the A-krim work was established, we had no framework. Everyone was simply brought together to start working. We didn't have a set of rules for how to operate. […] Looking back, I think we should have had the framework first. But, if we had waited for the framework, we would never have gotten started.**
>
> — Labour inspectorate representative, Norwegian focus group discussion

The focus group discussion participants also emphasised that the A-krim cooperation is still rather fragile, as there is high turnover among staff, agencies may pull back resources, and it is logistically challenging to have all actors physically present in the same premises four days per week. The current joint governance model also creates some challenges as the requirements are the same regardless of where the A-krim center is located, although crime in big cities varies from rural areas.

While labour exploitation and human trafficking are included in the formal definition of work-related crimes, the focus of the centres' fight against labour crime has primarily been on detecting crimes against the state, such as tax fraud, rather than on protecting victims' rights per se (Pekkarinen et al. 2021). In 2020, the police this withdrew from participating in joint inspections under the A-krim cooperation, except in situations of violence or other danger (Pekkarinen et al. 2021).

As documented by Jahnsen & Rykkja (2020), cooperation between the akrim centres and specialised units within the police has been uneven, as different police units have varying mandates, priorities and institutional incentives. In practice, it has often been easier for the A-krim centres to cooperate with immigration control units, which are more motivated to participate in inspections and joint operations, than with police units responsible for human trafficking or labour exploitation. Likewise, police investigators in the economic crime sections tend to prioritise large-scale tax and fraud cases over labour exploitation, as these align more closely with their performance indicators and prosecutorial strategies. This has contributed

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

to a situation where offences affecting the state have received more systematic follow-up than offences affecting vulnerable workers. (Ibid.) In July 2024 the Ministry of Labour and Inclusion proposed to amend the law so that the police will have a duty to assist the Labour Inspectorate if the inspectorate is refused to carry out its work, but the law has not yet been adopted (Arbeids- og inkluderingsdepartementet 2024).

> **The Labour Inspection Authority has its tools, the Tax Administration has its own, NAV and the police have theirs. We tailor which authority should be involved and what we should all focus on. After an inspection, the information we've gathered matters – can the authorities work individually with their information, or can we use sanctions together? If all four authorities can use their tools, the toolbox becomes larger.**
>
> – Labour inspection representative, Norwegian focus group discussion

When inspections reveal violations of regulations meant to protect workers, these are followed up with reactions and sanctions. The Labour Inspection Authority looks at employment contracts, correct wages in regulated sectors, overtime pay, working hours, workplace safety and proper accommodation when employers provide housing (A-krimsamarbeidet 2025, 11). The police conduct immigration checks related to residence and work permits (ibid.). However, research shows that when several agencies are merged, an organisational culture forms that is removed from each agency (Weldehanna 2024). This may result in removal of specialisation and has created a situation where the Labour Inspection Authority emphasises work-related crime instead of occupational safety and health, thus risking removing the workers' rights perspective from the remit of labour inspections (ibid.). This was also discussed in the focus groups.

> **One of the goals is to reach the workers, but we are not very well equipped for that. There are limitations in our inspection capacity [...] we try to collaborate, but we are not as well equipped as we would like to be.**
>
> – Labour inspection representative, Norwegian focus group discussion

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

In Sweden, the first two regional centres against labour market crime were established in 2022, and five more regional centres were set up in 2023. All centres are located in connection with the regional intelligence centres linked to the joint government initiative against organised crime (OC). The involved authorities are the following: Swedish Employment Agency, Work Environment Authority, Economic Crime Authority, Social Insurance Agency, Gender Equality Agency, Migration Agency, Police Authority and Tax Agency. A working group for joint methodological support among authorities has been tasked to develop a national methodological framework for consistent case management in the regions based on identified needs to form a unified, purposeful, and effective approach that also promotes continuous method development. In 2023, the inspections targeted several industries considered to be affected by labour market crime. such as berry picking, car workshops, car washes, slaughterhouses, construction, beauty salons, and restaurants (Myndigheter mot arbetslivskriminalitet 2024).

Swedish interagency cooperation report acknowledges that there are challenges that complicate the joint efforts of authorities against human trafficking and exploitation, such as conflicting goals by different authorities. One example of this relates to the efforts to increase the number of inspections.

The task of addressing complex issues like human trafficking requires that resources are also allocated to other measures besides inspections, such as intelligence collection, planning, and follow-up work.

Achieving good results in the fight against human trafficking may, therefore, conflict with the goal of increasing the number of inspections (Myndigheter mot arbetslivskriminalitet 2024, 28–29).

The regional coordinators can participate in workplace inspections when there is suspicion of human trafficking or human exploitation. They do not have the mandate to carry out inspections independently, but they can participate in order to support other professionals in cases of human trafficking or

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

human exploitation and contribute to identifying vulnerable workers (Ibid., 14). Regional coordinators however noted that it is challenging to identify potential victims during inspections, as the situation is often tense, and workers cannot disclose their actual working conditions during that single occasion (Johansson 2024; Schoultz & Smiragina-Ingelström 2023).

In 2024, a new law was adopted that requires the nine A-krim authorities to share information in order to combat fraud, regulatory violations, and criminal activity in working life (Regeringens proposition 2023/24:85). This law was welcomed as it makes it easier to share critical data, and to plan joint, targeted inspections. However, while the Gender Equality Authority is included in the law as one of the A-krim authorities, the law does not apply to the so-called regional coordinators, who are municipal employees of the local social services. Yet it is the regional coordinators who participate in multiagency inspections together with the other A-krim authorities, as the Gender Equality Authority is not represented in the A-krim centres. This drawback of the new law was discussed in the focus group discussions in Sweden.

> **The understanding around labour exploitation and incorporating the victim perspective at the A-krim centers has definitely developed. But we still see that it remains a challenge to integrate this victim perspective both within the A-krim centers and all the way through to the workplace inspections. We [...] emphasize the regional coordinators as being absolutely central to this work and very important. It's also a challenge that we cannot share information with them in the same way we can with other authorities.**
>
> — Work Environment Authority representative, Swedish focus group discussion

Within the framework of inter-agency cooperation, the regional coordinators identified 84 individuals who are assessed to have been victims of human trafficking or human exploitation. The majority were identified as victims of human trafficking or human exploitation for the purpose of forced labour or work under unreasonable conditions. Of the total, eight individuals were identified as victims of human trafficking for sexual

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

purposes and one individual for human trafficking for begging. Identified individuals are provided with information about their rights and available support options. If the individual wishes to receive support, the regional coordinators, in cooperation with other actors, ensure that the appropriate support services are offered (Myndigheter mot arbetslivskriminalitet 2024, 14–15). However, the lack of access to support and protection, such as housing, legal advice, healthcare, and financial support, in many parts of the country remains a big problem (Ibid., 29).

These challenges were also reflected in the focus group discussions. Clear boundaries between labour issues and criminal matters are often blurred, so a serious discussion on roles and responsibilities is essential, especially from the victim perspective as victims of crime have more rights and options than parties to civil cases.

According to the Swedish Gender Equality Agency, the focus on human trafficking needs to be strengthened in A-krim centres. Joint workplace inspections by authorities fail to place the victims in focus (Jämställdhetsmyndigheten 2025b, 7.) It is up to each individual authority to decide their priorities during workplace inspections.

Workplace inspections, where many representatives from various authorities and even those exploiting workers (employers) are present, can pose a challenge as they create a difficult environment in which to build trust and offer support to exploited workers.

Lessons from other countries show that it is crucial that vulnerable workers receive appropriate and easily understandable information about their rights and where they can seek support. This opens the opportunity for them to contact authorities or NGOs also at a later time (Myndigheter mot arbetslivskriminalitet 2024, 29).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

CASE EXAMPLE

Stegra steelwork factory construction worker deportation

STEGRA, AN EXTENSIVE steelwork project in Boden, in Northern Sweden, has been under scrutiny of the police, the Health and Safety Executive (Arbetsmiljöverket) and the Tax Office due to alleged crimes against the Swedish Immigration Act (Arbetet 6.11.2025). The working conditions originally came to light in June 2025, when information emerged that Romanian and Turkish construction workers had, despite signed collective agreements and union memberships, received little to no pay for their work (Proletären 25.6.2025). These working conditions arose at Ankitech, a Turkish subcontractor in the Stegra project (SVT 6.11.2025a). According to media reports, some workers worked up to 100 hours a week, with an hourly wage equalling to approximately one third of the required collective agreement wage, while some received no pay at all. Several Romanian construction workers were also caught, and later prosecuted for stealing food, due to being starved. (Proletären 25.6.2025).

In early November, the police took 19 people into custody for working without work permits, and the workers were to be deported (Arbetet 6.11.2025). The number of deportations rose to 32 persons (Byggnadsarbetaren 11.11.2025). Since then, Stegra has tightened its work permit requirements and revoked workplace access for 280 workers as a preventive measure (SVT 3.12.2024). The police are suspecting 15 alleged crimes against the Swedish Immigration Act, which includes employing employees without a work permit, or in other ways letting foreign nationals stay in Sweden without a residence or work permit (SVT 7.11.2025).

In addition, the Health and Safety Executive has required companies to implement changes to the handling of dangerous machinery and chemicals, and overall, address inadequate safety procedures (Arbetet 6.11.2025). Europol has also been involved and claims to have made some discoveries (SVT 6.11.2025b). However, in a brief literature review of about 30 news articles, it seems that the main focus has been on deporting workers without working permits, rather than on addressing other work-related crimes, or the possible exploitation of those workers.

Already before the more recent developments, workers have tried to claim their unpaid wages. Some workers engaged in a hunger strike (Aftonbladet 4.11.2025), and one trade union managed to make a deal that gives some of the workers some of their unpaid wages (Byggnadsarbetaren 24.9.2025). In November 2025, 8 Turkish former construction workers spent their last money to come to Sweden to protest, hoping to collect their wages (SVT 23.11.2025).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Hidden Exploitation and Access to Justice

What schemes are used to hide exploitation from monitoring authorities?

THE RISKS for labour exploitation are particularly high in connection with long supply chains and the use of staffing agencies in sectors such as construction, agriculture, cleaning and catering (e.g. Jokinen & Ollus 2019; Pekkarinen et al. 2023). Posting of workers has also increasingly been identified as a tool for criminal activity. In Sweden, new methods of exploitation have emerged in the berry-picking industry due to the rise of so called "freelance pickers". Many are at risk of exploitation as there is a lack of regulation on freelance pickers as well as organisation regarding housing, transportation and buyers. There have also been cases of children being exploited in the berry-picking industry. (Jämställdhetsmyndigheten 2025b, 14.) Also lawyers, authorised public accountants, and real estate agents can function as enablers of money laundering in labour exploitation cases (SOU 2025, 49–50).

Finnish Labour inspectorate has noted that in inspections concerning the use of foreign labour are increasingly revealing situations where it appears that a foreign individual is in an employment relationship with an employer, even though the person paying for the work claims that no such employment relationship exists. Traditionally, such cases have been encountered particularly during unannounced inspections of restaurants where individuals have been found at the workplace who, according to the employer, are not employees but are merely there to help out or to gain work experience as interns. (Työsuojelu 2025b, 8).

As in the previous year, in 2024, the Finnish Labour Inspectorate also identified an increasing number of cases where there was suspicion of disguising an employment relationship as self-employment. Often, the employment was presented as so-called "light entrepreneurship". This phenomenon has become more common and is particularly evident in the construction sector, but also in manufacturing, cleaning services, car repair and wash services, and seasonal work sectors. The inspectors also increasingly encounter cases where either an employment relationship has been converted into a contract assignment – sometimes without the worker even realising it – or a direct contract for services has been made with the worker, although the terms of the agreement resemble those of an employment contract. So-called bogus self-employment

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

has become integral part of labour exploitation, and it concerns especially workers who lack language skills and do not know what the change in contract and status actually means. (Työsuojelu 2025b, 8.)

CASE EXAMPLE

Food couriers and employment vs. self-employment in the Nordic countries

The question of whether self-employment is actually employment has been discussed in the Nordic countries, especially in relation to food delivery (Floros 2023). In 2025, three bicycle couriers won a lawsuit in Norway against the food courier company Wolt. In the verdict the Oslo district court argued that the workers are not self-employed but should be considered employees. The company was also ordered to grant them permanent employment, back-paid holiday pay, overtime pay, holiday pay supplements, and damages. The ruling is not yet final. (Fellesforbundet 12.2.2025). In Finland, the Supreme Administrative Court has similarly ruled that couriers working for Wolt are in an employment relationship, although the court argued that the working-time legislation does not apply to their work (Aluehallintovirasto 2025). Also, in Sweden the Administrative Court of Appeal in Gothenburg ruled in 2024 that Wolt's food-couriers are employees (Arbetet 6.12.2024). The precarious working conditions in the food courier sector has received media attention in Finland. Investigative reporting shows that some couriers work without adequate residence permits, that others use false identities, that there is a business where couriers rent their courier accounts to others for a hefty fee, and that the overall pay for the work is low due to an oversupply of couriers in the market. (Helsingin Sanomat 28.2.2023; YLE 23.4.2023.)

THE FINNISH Tax Authority highlights that companies engaged in grey economy or criminal activities often may appear to fulfill all official obligations so that their activities seem as legitimate as possible. Actual responsible individuals behind a company are often disguised in official registers by using front persons with no prior record of neglecting official obligations. Furthermore, the person in charge may be connected to multiple companies involved in criminal activities. Criminal activity can also be carried out under the guise of associations, foundations and cooperatives. The use of foreign companies in grey

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

economy and economic crime is also increasing. Furthermore, in particularly short-lived companies are often used as front businesses for committing fraud. The business activity that the company reports to authorities may be entirely fabricated and completely fictitious wages can also be reported to the income register. In addition, criminals are reported to have used artificial intelligence to create fake business plans and forged documents. (Verohallinto 2025; see also Verohallinto 2024.)

Similar findings are reported from Norway as it has been observed that unscrupulous businesses and repeat offenders commit tax and duty fraud, bankruptcy-related crime, and fictitious invoicing. Norwegian authorities have also noted that there are links to criminal networks in many of the sectors where labour-related crime is traditionally reported (A-krimsamarbeidet 2025, 27). NTAES' analysis of register manipulation shows that actors committing loan fraud are also involved in offences related to work-related crime (NTAES 2024a). Also Danish sources have identified misuse of creative company structures, the use of front men, and outsourcing to subcontractors or bogus self-employed individuals as an increasing problem in the labour market (Beskæftigelsesministeriet 2021, 38). In Iceland, labour exploitation has been linked also to staffing agencies, which recruit workers from the Baltic countries and Eastern Europe (RUV 8.10.2024).

The Finnish Tax Authority has also noted in relation to their latest supervision activities in the restaurant sector that the use of undeclared work, under-the-counter sales, and cases of bogus self-employment related to employees have been detected more often. Some restaurants operate as general partnerships that can momentarily involve several partners who are quickly replaced by new ones. Observations have been made that there are restaurants in Finland that have no official employees besides the entrepreneur, which is impossible considering the restaurant's opening hours. Virtual restaurants that only provide delivery services often have multiple business IDs, rapid changes, and lack a fixed location, making effective oversight difficult or even impossible. (Verohallinto 2025.)

According to the Swedish police officers interviewed by Johansson (2024, 25), the fact that labour exploitation can take place within otherwise legal activities, makes it more difficult to identify and investigate. Exploited workers are afraid of telling the authorities about an exploitative situation and participating in a criminal investigation, as they are often dependent

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

on the salary and work permit, which are tied to the employer. Exploitation often occurs within complex business structures, yet there may be no written work contracts or proof of payments. All interviewed police officers pointed to the difficulties in proving the circumstances in these cases, especially what happens behind closed doors. (Ibid.; see also Schoultz & Muhire 2023.)

There also are evident links between work-related crime, labour exploitation and organised crime. Organised crime actors are versatile in terms of the offences they commit and operate both nationally and globally as means supporting their criminal activities. Organised criminals use legal business structures to support, disguise and facilitate illicit activities and to launder their proceeds (Europol 2024). According to Europol (2024, 9), three sectors are particularly affected by criminal infiltration or abuse: logistics (i.e. transport and import/export companies), cash-intensive businesses (in particular hospitality) and construction. Criminal groups can also use legitimate businesses for various purposes, including concealing the origin of funds obtained through criminal activities, generating profits from business operations, committing various types of fraud and financial crimes, sustaining illegal activities, and concealing them (see also Jokinen & Ollus 2019; CSD 2019).

Do exploited workers have options to claim their unpaid wages?

IN ALL Nordic countries, exploited migrant workers lack options to claim their unpaid wages (e.g. Haapasaari et al. 2024; Davis & Haapasaari 2024; Pekkarinen et al. 2021; Jokinen et al. 2023). Also the support available to victims of labour exploitation is often insufficient, especially if they are men, as they for example lack options for shelters/safe accommodation (e.g. Smiragina-Ingelström 2024; Lingaas et al. 2020; Lingaas 2022).

Victims of labour exploitation may claim unpaid wages as well as compensation for the damages in conjunction with criminal proceedings. However, in the case of Finland, even if the victim wins the case in court, the unpaid wages may result in them not being claimed because there is no mechanism that covers legal aid costs for the victims in the enforcement proceedings after the guilty verdict (Haapasaari et al. 2024, 45). If the employer has become insolvent, the wage guarantee or pay security act applies, but migrant workers may not be sufficiently aware of this avenue to file wage claims (ibid., 57).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Similarly in Norway, there is a wage guarantee arrangement, but it is slow in processing cases and paying out the money (ibid., 106). Civil litigation is also possible, but exploited workers usually need legal counsel or help from a trade union or an NGO to initiate and go through such processes (ibid.). In Norway, NGOs highlight that non-unionised members have few means to cover legal aid costs and thus often need to rely on civil society actors (ibid., 116).

As regards Sweden, it has been noted that few cases result in prosecution (Schoultz & Muhire 2023), and thus only a small number of victims can claim unpaid wages through criminal proceedings. Mechanisms that enable claims outside criminal proceedings need to be developed. Legal assistance and protection from deportation before a compensation claim can be made is crucial to uphold the rights of victims (Jämställdhetsmyndigheten 2025b, 17).

Vulnerable workers lack knowledge of their statutory rights.

There is also no designated authority in Sweden that is responsible for providing information about, for instance, the fact that individuals who have worked in Sweden without a valid work permit are, by law, entitled to three months' wages in case of a dispute regarding wages (Haapasaari et al. 2024, 144). There is often a lack of shared understanding of individuals' vulnerability, along with insufficiently structured efforts to respond to indicators of exploitation. (Jämställdhetsmyndigheten 2025b, 45.) However, the trade union SAC and its local sections actively provide assistance to migrant workers in claiming unpaid wages and has for instance used the law on contractors' liability and the Wage Guarantee Act in doing so (Schoultz & Muhire 2023, 8). They also actively report cases to the police (Haapasaari et al. 2024).

In the EU member states Employers Sanctions Directive is supposed to protect migrants in irregular situations by obligations to prohibiting their employment, detailing minimum standards on measures and sanctions that the Member States must apply and describing protective elements to correct injustices. Even though Member States have transferred the directive into their legislations, there are gaps in implementation especially regarding the corrective measures (FRA 2021, 9).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

According to FRA, migrants do not actively use their existing complaint systems. This can be due to migrants' limited information on their own rights as well as fear of being returned to their countries if detected. No Member State has collected systematic data on complaint outcomes about back payment of due wages, so it is challenging to assess the complaint system (Ibid., 5–6) In most of the Member States, labour inspectorates are obligated to inform workers of their rights and complaint mechanisms. Still, it is unclear whether this occurs in practice. (Ibid., 25–26).

In Sweden, the national implementation of the Directive gives individuals who have worked without a valid work permit the right to claim up to three months' wages. If it can be proven that the person worked and there is a dispute about payment, there is a presumption in law about full-time work for three months. However, according to Johansson (2024, 24), the Swedish system provides limited opportunities to make use of in practice: relevant individuals are often not informed about the possibility; a criminal investigation must have been initiated in which they cooperate before they are deported from Sweden; and if they are granted a temporary residence permit, they have limited access to legal aid to apply for and pursue the case in a civil process. Until 2024, three plaintiffs have been awarded such payment (ibid., 23). Also in Finland only three plaintiffs have been awarded compensation on the basis of the Employers Sanctions Directive, which entered into force in 2012 (National round table discussion, Finland, communication by representative of the Finnish Immigration Service 17.12.2025).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Key findings for part II

- **Labour inspectorates** in Finland and Norway have explicit mandates to monitor wages and terms of employment for migrant workers. In Norway the mandate covers sectors with extended collective agreements. However, their Swedish and Danish counterparts lack such mandates, which limit their ability to detect exploitation beyond occupational safety and health (OSH) issues.
- **Inspectors sometimes** use OSH provisions as an entry point to uncover signs of exploitation (e.g., unsafe housing, excessive hours), but this approach is indirect and insufficient for addressing labour exploitation.
- **Trade unions** struggle to mobilize migrant workers due to language barriers, fear of retaliation, and precarious employment conditions. Migrants often lack awareness of union benefits or distrust institutions.
- **While social partners** are central to Nordic labour models, enforcement of terms of employment for non-unionized migrant workers remains a concern especially in Sweden and Denmark.
- **Labour exploitation** is framed differently across Nordic countries, sometimes as labour law violations, wage disputes, or as criminal offenses. This inconsistency leads to fragmented enforcement and limited deterrence.
- **A-krim centers** represent a promising multi-agency model for tackling work-related crime, but their focus is often on financial crimes against the state rather than on victim protection and wage recovery.
- **Labour exploitation** is often hidden through subcontracting chains, bogus self-employment, and falsified contracts, making detection difficult for authorities.
- **Exploited migrant workers** face significant obstacles in claiming unpaid wages because of lack of information, excessive legal costs, fear of deportation, and lack of documentation. Remedies exist in theory but are rarely accessible in practice.



CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Part III

Prevention, Enforcement, and Protection Against Labour Exploitation – empirical findings

The previous section dealt with challenges and concerns concerning work-related crime and labour exploitation. Next, we shift perspective from challenges toward solutions. This section addresses good practices and concrete examples from the Nordic and Baltic regions, with input from the empirical findings from the focus group discussions and other empirical data.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Strengthening Policies, Inspections and Monitoring

National policies as strategic tools

THIS REPORT has highlighted the key role of the State in setting standards and priorities that govern the actions against work-related crime and labour exploitation at the national level. National policies are therefore crucial in showing political commitment, acknowledging the phenomenon, and in defining responsibilities, measures, resources and timeframes. The Nordic and Baltic region presents several recent and promising examples of national policies that address work-related crime, and labour exploitation, in particular. The list below includes action plans in force at the time of writing and is not comprehensive in view of all past action plans or strategies.

- **In 2025, Norway introduced an updated Action plan to counter social dumping and work-related crime.** The action plan includes six focus areas. The plan includes several concrete actions, such as increasing union membership and collective agreement coverage, introducing free legal aid for wage theft claims, increasing support for victimised workers, strengthening the roles of business and public procurement, strengthening the understanding and knowledge of work-related crime through targeted research, and strengthening the multi-agency cooperation against work-related crime, including enhanced information sharing between authorities. The Labour Inspection Authority can now also impose administrative fines on the spot for clear violations and, under certain circumstances, imposing fines on individuals, and the plan outlines that serious labour crime and violations where administrative sanctions are insufficient shall be reported to the police. (Handlingsplan mot sosial dumping og arbeidslivskriminalitet, 2025.)

- **In 2025 Norway also introduced a National strategy against human trafficking 2025–2030.** The strategy targets four priorities to combat human trafficking: a coordinated national approach across sectors and civil society; proactive prevention through knowledge and risk-reduction; predictable assistance and protection for victims via accessible services; and stronger prosecution

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

through legal review, enhanced police capacity, and interagency collaboration. The strategy mentions e.g. that the police shall consider measures to strengthen cooperation with authorities and non-profit organisations that provide assistance also to workers who have been severely exploited and the Labour Inspection Authority shall develop guidelines and routines for detecting and following up on possible cases of human trafficking for forced labour. (Regjeringen 2025.)

- **In 2024, Finland introduced an Action plan against labour exploitation 2024–2027.** The plan includes actions to strengthen the exchange of information and cooperation between authorities, enhance the knowledge of authorities on the phenomenon and strengthen victims' rights, increase awareness of rights and access to services among migrant workers, strengthen the social responsibility of employers, and increase sanctions for exploitation. (Ministry of Economic Affairs and Employment 2024.) Finland also had a comprehensive National Action Plan against Trafficking in Human Beings 2021-2023, which was developed in a broad consultation process, involving government entities, civil society representatives, labour market parties, municipalities and researchers (Roth & Luhtasaari 2021). The National Action Plan for 2026–2028 is currently under development.

- **The Danish National Action Plan against Human Trafficking 2022–2025 includes several measures to combat labour exploitation.** The government introduced a new provision in the Penal Code that criminalises exploitation of others for work under clearly unreasonable conditions, with penalties of up to six years' imprisonment, even if coercion cannot be proven. A National Unit for Special Crime was established to strengthen investigations and prosecution of complex organised crime, including labour exploitation and trafficking. Authorities are required to cooperate closely, with early involvement of the prosecution service and the Centre against Human Trafficking, and an inter-agency group has been set up to identify victims, prosecute perpetrators, and prevent exploitation in workplaces and private homes. These steps aim to improve prevention, support victims, and ensure stronger

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

enforcement against those who exploit workers under unacceptable conditions. (Transportministeriet 2022.) A forthcoming action plan was under preparation at the time of writing (communication with the Danish Centre against Human Trafficking Centre 18.12.2025).

- **Sweden's latest strategy on work-related crime is from 2022.** The final report of the Delegation against work-related crime (SOU 2025) includes many suggestions on concrete actions, but has as of yet not resulted in subsequent action plans or governmental strategies on work-related crime.

- **In Iceland, according to our sources, the new action plan to combat human trafficking will be developed in 2026.** It will replace the government's 2019 framework for effectively addressing trafficking in persons and other forms of exploitation.

- **Lithuania has a National Action Plan for the Combating of Human Trafficking 2024–2026 which identifies labour exploitation and forced labour as key priorities.** The plan includes strengthening prevention through risk analysis, awareness campaigns, and training for frontline services, as well as improving victim identification and assistance, ensuring access to protection and support services for exploited workers. The plan also calls for enhanced monitoring of recruitment practices, stricter regulation of employment agencies, and legal reforms to close gaps that enable exploitation. On enforcement, it prioritizes effective investigation and prosecution of forced labour cases, improved interagency cooperation, and data collection for better policymaking. Special attention is given to vulnerable groups such as migrant workers, who face higher risks of exploitation. (Lietuvos respublikos vidaus reikalų ministras 2024).

- **The Latvian Human Trafficking Prevention Plan 2025–2027 focuses on four areas.** Prevention activities include awareness campaigns targeting society and high-risk groups, training for frontline professionals (police, border guards, labour inspectors, social workers), and the development of a screening tool for trafficking indicators. The protection efforts include the expansion

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

> of social rehabilitation services from the current 180 days, enhanced access to interpreters and tailored support. and strengthened cooperation with key NGOs. Strengthened prosecution includes improved investigative capacity and evidence collection, including digital exploitation detection, and addressing delays in criminal proceedings. Finally, the plan outlines enhanced inter-agency and NGO collaboration and alignment with EU and international obligations. (Ministru kabineta 2025.)

However, national plans should be followed up with sufficient resourcing and timeframes for the proposed activities to be efficient and also measurable.

Expanding the mandate of labour inspectors and social partners as a way of addressing labour exploitation

AS DISCUSSED in the previously, a key challenge for the oversight of the terms of employment of (exploited) migrant workers is the question of who should have the mandate to oversee the terms of employment of those workers who are not members of trade unions. It would be important for all Nordic countries to extend a mandate to a specific authority, such as the labour inspectorate to monitor the terms of employment for everyone as is the case in Finland and in Norway concerning specific sectors with extended collective agreements. Alternatively, the mandate of the work environment authority could be expanded to monitor only the terms of employment of migrant workers who are not members of trade unions and work in certain risk sectors, such as construction, agriculture and cleaning. This would not interfere with the role of trade unions, or the inspections conducted by trade unions, as also Finnish trade unions conduct their own inspection visits despite the mandate of the Finnish labour inspectorate to oversee also issues related to wages.

Another option would be to extend the cooperation of social partners, in line with recent developments in Iceland. In Iceland, both the trade unions and authorities have a mandate to monitor working conditions of (migrant) workers. According to the Act on Workplace ID Cards and Workplace Surveillance (42/2010) trade unions have a right to participate in workplace inspections and can also report violations to the Directorate of

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Labour. Trade union density in Iceland is very high, approximately over 90% of the population, and also migrant workers are often members of the unions (Focus group discussion in Iceland, 18.3.2025).

On 1 January 2025, an amendment to the Act on Workers' Terms of Employment and Compulsory Pension Insurance entered into force in Iceland. The act formalises the existing collaboration between state agencies and trade unions, including in workplace inspections. The law also enables parties to share necessary information with one another. The new, formal collaboration between the public sector and social partners has two dimensions. First, there a is platform bringing together in particular the Administration of Occupational Safety and Healthand social partners. They have regular operative meetings, approximately every two weeks. These meetings discuss trends, but also concrete, individual cases. According to a representative of the trade union movement in Iceland, the meetings have increased the trust as well as every-day collaboration between the parties. Second, a committee consisting of the social partners, key institutions and four ministers (the Prime Minister, Minister of Justice, Minister of Social Affairs, and Minister of Finance) has been established. The committee is to prepare a proposal for the government's policy and action plan regarding crimes in the labour market by December 2025. (Communication with trade union representative from Iceland, 6.8.2025; See also Mbl.is 5.5.2025).

The Icelandic developments can be understood as a hybrid oversight model, where the cooperation between trade unions and state actors has been formalised.

It is still early to assess how well the formalised cooperation will work in practice and what effects it will have, but the Icelandic model can be considered innovative as it aims to resolves some of the problems of who should be responsible for overseeing the working conditions of migrant workers.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Collective agreement-based business scheme in Denmark

IN DENMARK, THE Government is introducing a collective agreement-based business scheme to give companies easier access to foreign labour from selected countries under Danish pay and working conditions from the beginning of 2026. To use the scheme, businesses must have an agreement between the Danish Employers' Confederation and the Trade Union Confederation, reinforcing the Danish labour model. The scheme will initially apply to nationals from countries such as the United States, United Kingdom, India, China, Brazil, and Ukraine. Alongside this, the Government is launching new measures against social dumping, including mandatory ID cards on major construction projects. These initiatives aim to protect law-abiding employers, ensure fair competition, and safeguard workers from exploitation and unsafe working conditions. (Beskæftigelsesministeriet 2025.) It has been reported that social partners and Danish authorities must assess whether the collective agreement has been respected shortly after a foreign worker is hired. The government has earmarked funds for this monitoring, which until now has largely been carried out by trade unions (Preisler 2025b). The model has also raised some concerns according to Danish stakeholders (National online round table discussion with Danish experts, 17.12.2025).

Speaking with the workers during workplace inspections and using interpretation

TRADITIONALLY LABOUR inspectors have focused on dialogue with the employer, but it is equally important to talk directly with the workers to uncover possible problems with their occupational health and safety, or terms of employment, depending on the mandate in question. One essential method of uncovering labour exploitation cases during inspections is to talk with the workers themselves, rather than just with the employer or their representative, or relying on various documents.

The manual for labour inspectors developed by the EU Fundamental Rights Agency (FRA) highlights that workplace inspectors should speak to workers individually, separately from employers and other workers, as employers or other workers could play a role in the labour exploitation (see also ELA 2025). Other workers with language skills should not be employed as interpreters, as they may be involved or report

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

to the employer. It is also important that inspections are conducted unannounced. If the inspection is announced, the employer might ask the worker not to come on the day of the inspection, hide the worker or instruct the worker on what to tell inspectors in advance. (FRA 2024, 20.)

For various reasons, it may be difficult for exploited workers to disclose their experiences. Therefore, labour inspectors should try to distinguish themselves from the police and explain that their role is primarily to sanction the employer and to support the worker.

The inspectors should explain to workers that they are there to safeguard their rights and focus on providing workers with information on their rights and what can be done to enforce them.

Inspectors should also inform the workers that they are not suspected of wrongdoings and the monitoring is directed at the employer, and the inspector is present to ensure that everything at the workplace is in order. Inspectors should however be transparent about any reporting obligations they may have to police or immigration authorities (Ibid.). The European Labour Authority (ELA) has also recently provided labour inspectors with guidelines for interviewing workers, including concrete questions which may be used to uncover information about their circumstances and conditions of work and terms of employment (ELA 2025, 14–15.).

For example, in Denmark even though the labour inspectors are not monitoring wages, the inspectors are entitled to interview all employees when ensuring their work environment is in order. They can take samples from the business for analysis and to photograph work situations. Phone interpretation can be used when necessary. Inspectors also have a specific mandate to control employer-provided accommodation. (Workplace Denmark n.d.-c)

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

It was also discussed in the Nordic focus groups that workers should be advised to keep their own working hours records as a backup.

A police representative in the Finnish focus group discussion said that this could be used in police investigations as a way of assessing the actual number of hours worked, as often there is just word against word. Without records, it is impossible to verify e.g., missing overtime pay. Workers should therefore be clearly instructed to keep such records when their employment begins, and the records should be kept in a systematic manner. There are various apps available for keeping such records, but they can also be kept on paper.

In addition to keeping records of working hours, Nordic experts mentioned that smartphones can be used to document working hours: workers can take pictures when they start working and when they leave work, and the time stamp and location of the picture can function as proof of actual working hours.

With regard to interpretation, the Finnish focus group discussants raised the use of AI-tools for interpretation. A trade union representative mentioned that they use online translation tools to communicate with migrant workers.

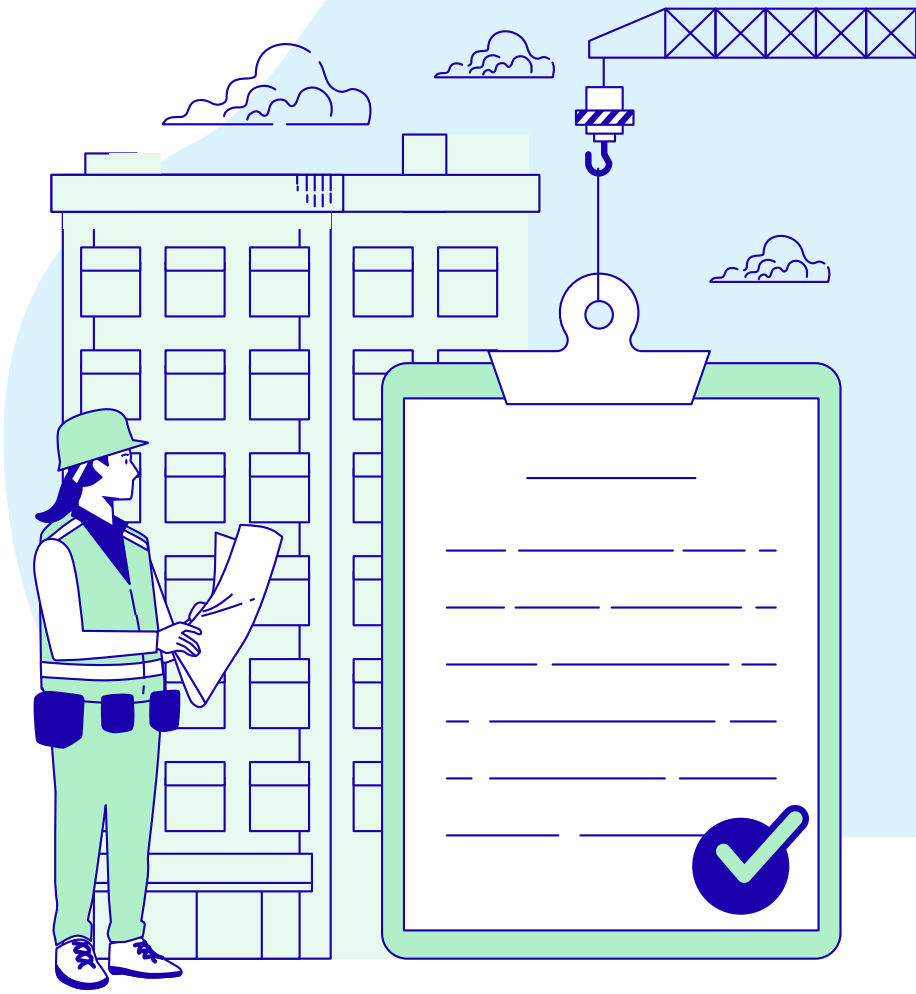
> **Translation programs have developed tremendously. Google can now translate entire conversations. Just a couple of weeks ago, I had a very difficult discussion with a Kyrgyz worker using only Google Translate, and it worked well. I see this as something that levels the playing field and creates real opportunities for people to truly understand what's being discussed.**
>
> — Trade union representative, Finnish focus group discussion

Finnish labour inspectors use specific interpretation devices, which fit in the pocket, and interpret many languages. These devices are more convenient and also more secure vis-a-vis data protection requirements than using e.g., Google Translate. They can be carried during inspections, and can be used if

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

inspectors encounter foreign workers, with whom they do not share a common language. Professional interpreters can also be used, e.g. over the phone. Professional, qualified independent interpreters also provide cultural interpretation, which can be valuable at inspections. While professional interpreters are crucial in formal processes, getting one for an inspection at short notice can be costly and is not always practical or possible during inspections, and sometimes it is difficult to obtain interpretation from rare languages.

Furthermore, in smaller language communities there is a risk that the interpreter may know the person being interpreted or their employer. This can lead to situations where a potentially exploited person, upon recognizing the interpreter, refuses to disclose details of their experiences, or the interpreter may omit important parts to protect a familiar employer. This can also compromise anonymity despite confidentiality requirements binding interpreters (Ollus et al. 2024, 37–40).



CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Using indicators for identifying work-related crime and exploitation

OCCUPATIONAL SAFETY and health inspectors, trade union representatives, and others engaged in oversight at workplaces are uniquely placed to identify features of work-related crime and labour exploitation in the course of their oversight activities. Also, taxation, fire, health, food safety and other inspection authorities can identify risks during inspections. It is therefore important that all inspection authorities and social partners are informed about the key indicators of work-related crime and exploitation for identifying potential risk situations and victims.

There are examples of relevant indicator lists in several of the Nordic countries:

- **HEUNI checklists for identifying labour trafficking and exploitation during inspections:** In 2020 HEUNI published an investigation tool for law enforcement and labour inspectors, describing how cases of exploitation should be uncovered from the initial impulse, through investigation, victim support and all the way to trial. The tool features two checklists, one for labour inspectors on how to identify potential cases of labour trafficking and exploitation during inspection, and one for concrete questions that can be asked from the victims. (Ylinen et al. 2020).

- **Danish indicators for identification of trafficking and forced labour:** In 2024, the Danish Centre against Human Trafficking (CMM) released a report detailing indicators which law enforcement, healthcare and other professionals can use to detect and to respond to potential human trafficking situations (Social- og Boligstyrelsen 2024). Some examples for forced labour indicators targeting companies are money transactions outside of business hours or from unexpected customer groups, suspicious social media posts where job advertisements make false promises, employment papers being handed over to the company by 'friends' or 'family members', or employee giving unclear details of working hours and salary (Social- og Boligstyrelsen 2024, 10). Other indicators include features such as low or no salary, long working hours, or a lack of employment contract

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

(Social- og Boligstyrelsen 2024, 11). Also, in Denmark, all businesses and companies that have employees must carry out a health and safety risk assessment in the workplace. The Danish Working Environment Authority has prepared a number of checklists that can be used in different sectors. The checklists are especially suitable for companies with fewer than 10 employees.[4]

- **A practical handbook for encountering victims of labour exploitation from Sweden:** The Swedish NGO Räddningsmissionen launched a practical handbook in 2025 with the intention to meet a need identified among those who, in their work, encounter vulnerable individuals when there is suspicion of human exploitation. The handbook provides tips on how to detect exploitation and how to guide someone seeking help towards, e.g., insurance coverage and opening a bank account. It also explains how to claim unpaid wages and what risks that may involve. In addition, it includes a list of organisations that can be contacted for advice and practical support (Räddningsmissionen 2025). A recent knowledge overview on labour exploitation and trafficking for forced labour provides information for Swedish professionals so as to enhance their skills to prevent and identify exploitation (Jämställdhetsmyndigheten 2025a).

4 Health and safety risk assessment.

In addition, there exist a number of sector-specific checklists in the Nordic countries, e.g., the following:

- **The Danish** Association for Responsible Construction [Byggeriets Samfundsansvar] has developed a set of templates to support public and private construction procurers in including social responsibility in their tender documents and contracts. The templates include e.g. contractual clauses on the liability of subcontractors, and on working conditions (labour clauses). (Byggeriets Samfundansvar n.d.)

- **A guide** developed by Motiva in cooperation with HEUNI (in Finnish) outlines how public procurement entities can prevent labour exploitation in cleaning service procurement by introducing a monitoring model that

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

supports the implementation of social responsibility throughout the different stages of the procurement process, from tendering to contract monitoring and intervention. The guide addresses risk identification, supplier evaluation, development of contract terms and monitoring mechanisms, as well as safeguarding workers' rights. (Motiva Oy & HEUNI 2025).

Introducing administrative sanction fees for labour law violations and focusing inspections to risk targets

ADMINISTRATIVE SANCTIONS can provide a solution in situations of occupational safety and health violations that do not fulfil the elements of a crime. In Norway, the Labour Inspection Authority can hand out an administrative fine (overtredelsesgebyr) in line with the Working Environment Act (§ 18–10) and also orders for employers to pay back wages or overtime. The fine can be imposed for violations of regulations that are considered serious enough and where issuing an order for future compliance is not considered sufficient. The size of the fine can be as high as 4% of a company's turnover. Norwegian focus group discussants stated that the Labour Inspection Authority has increased its use of administrative fines, and the fines are also now larger than before.

Also in Finland focus group participants discussed the need to grant labour inspection authorities the possibility to hand out administrative sanctions in simpler cases and especially in situations where employers repeatedly neglect obligations. In Norway, cases that are serious enough are reported to the police rather than handled administratively. If the police later dismiss a case due to capacity constraints, the labour inspection authority can still choose to impose an administrative fine provided that the statute of limitations has not been reached. However, focus group participants raised concern about the risk of administrative sanctions replacing police investigation:

> **There's a risk that the police may rely too heavily on us to handle cases they don't have capacity to pursue.**
>
> — Norwegian Labour Inspection Authority representative, Norwegian focus group discussion.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

In Finland focus group participants emphasised that administrative fines should be aimed at breaches that are clear and precise. Even if administrative fines have been issued and the same matter can no longer be investigated or pursued in a criminal process, the fine can still serve as a basis for a larger criminal case. The fine can help demonstrate that the actor was fully aware of their actions, had been instructed to amend their actions, and had already received a fine for a specific activity but still failed to correct their behaviour. Therefore, they argue, an administrative fine can serve as a foundation for a strong criminal case.

It is also evident that the authorities will always be one step behind unscrupulous criminal actors. In order to best use the available resources, inspections should be targeted and risk based. Norwegian and Danish focus group participants emphasised that the focus of joint authority action should be on those areas with the highest risk of uncovering irregularities, including non-compliance or criminal activity. The risk-based approach not only applies to specific companies or actors, but also to certain sectors and phenomena. This will require strengthened sharing of information between actors so as to best identify the greatest risks, and targeting oversight based on those risks.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Criminal law as a tool to address exploitation

Criminalisation of wage theft

UNDERPAYMENT HAS in research shown to be the most common form of labour exploitation (Jokinen & Ollus 2019). In the Nordic and Baltic countries, it has only been explicitly criminalised in Norway in the form of wage theft. Norway's provision governing wage theft was introduced in 2022 (sections 395 and 396 of the Penal Code). It refers to situations where the employer intentionally and for their own benefit withholds money from the employee's wages, holiday allowance or other statutory payments.

From the implementation of the wage theft provisions on January 1, 2022, until May 25, 2024, a total of 283 criminal cases related to wage theft were reported. As of June 2024, only 17 of these cases had resulted in an indictment, and only one had resulted in a final and legally binding conviction for wage theft. In this case, a Bulgarian man was convicted for failing to pay the minimum wage to the victim, a Greek woman employed at his restaurant (NTAES 2024b, 11.). Most of the reported wage theft cases (40%) relate to exploitation in the construction sector, 20% are connected to the service industry, including hotels and cleaning services, while 18% involve the transportation sector (NTAES 2024b, 14). Most of the victims are of Polish origin (27%) while about one fifth (22%) are Norwegian citizens (ibid., 16–17).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

CASE EXAMPLE

Conviction on wage theft

IN FEBRUARY 2025, Elverum District Court in Norway found the former CEO of a telecommunications company guilty of aggravated wage theft under Section 396 of the Criminal Code. The court sentenced him to 105 days of unconditional imprisonment. As stated in the verdict, it has been proven beyond reasonable doubt that the defendant, from January to June 2022, failed to pay wages, overtime compensation, holiday pay, and other benefits to which the employees were entitled. The verdict also mentions delayed wage payments, unpaid travel time, and the absence of a system to track working time. During 2022, the CEO had withheld a total of NOK 419 994 in earned wages from five employees. This is the first case in the electricity and IT sector where an employer has been convicted and sentenced to unconditional imprisonment for committing wage theft. (Frifagbevegelse 19.2.2025)

THE NORWEGIAN Labour Inspection Authority supervises wages in areas covered by extended collective agreements. If the violations are considered to fall under the provision on wage theft in the Penal Code, the Labour Inspection Authority may file a report with the police. However, NAV (the Norwegian Labour and Welfare Administration) and the Tax Administration do not have legal frameworks specifically covering wage theft. Another challenge relates to access to the employer and employee registers. The Labour Inspection Authority has access can demand timesheets from employers, but they do not have access to data submitted by employers. There are also regional differences in how wage theft is addressed and prioritised, as well as different interpretations of the concept of wage theft among the government agencies and what violations are serious enough to be considered wage theft. (NTAES 2024b, 25–26.) While wage theft is considered one of the biggest threats within labour market crime, most cases are dropped due to a lack of case processing capacity (Politiet 2025, 20).

This observation was also confirmed by focus group discussants. Participants emphasised that the law is currently not implemented sufficiently. Underpaid workers are increasingly coming forward, but the application of the law remains limited, and few cases have proceeded in the criminal justice system. The police tend to discontinue investigations of wage theft, as

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

the cases often require the same level of evidence as more serious crimes, and responsibility is placed on the workers themselves to provide sufficient evidence.

> **[W]e have supplied an extreme amount of information and documentation showing that wage theft has occurred. But generally speaking, it is extremely difficult to move forward within the legal system when it comes to recovering unpaid wages. […] It's also difficult because this isn't covered by the free legal aid scheme[5], for example. People simply don't have the means to pursue the case further if the police dismiss it.**
>
> – Civil society representative, Norwegian focus group discussion

Labour inspection representatives also emphasised that it is often difficult to determine the unpaid wages and they cannot inspect salaries in sectors that are not covered by an extended collective agreement. Focus group participants however also emphasised that the law serves as a positive example for other countries, and it provides legal recognition, terminology and acknowledgement of wage theft. They also pointed out that the law can have value in negotiations with employers, as the threat of criminal charges sometimes helps resolve wage disputes outside of the justice system, where cases can take several years without a solution.

The other Nordic countries have looked into the Norwegian example with interest. The wage theft legislation was brought up as an interesting possibility in the focus group discussions in Iceland, Sweden and Denmark. Also the Swedish Delegation against work-related crime discusses the introduction of criminal provisions on wage theft based on the Norwegian model, but concludes that it would not be appropriate, as it would go against the Swedish labour market model, where the parties are responsible for interpreting the content of collective agreements, and where any disputes regarding collective agreements are ultimately decided by the Labour Court (SOU 25:2025:, 277–280). The law is also assessed to have been ineffective in addressing underpayment by the Delegation., they however suggest legislating against and introduce criminal penalties when employees pay back their wages to their employers (ibid., 280–286).

5 Free legal aid for wage theft claims will be introduced in line with the updated Action plan to counter social dumping and work-related crime (Handlingsplan mot sosial dumping og arbeidslivskriminalitet, 2025).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Criminalisation of extortionate work discrimination and usury in employment

IN FINLAND the legislator became aware of the exploitation of migrant workers already in the early 2000s after a highly publicised case of exploitation of Chinese stonemasons at a Finnish quarry (see Ollus 2016, 25). As a solution, Finland introduced the offence of extortionate work discrimination in chapter 47, section 3a of the Criminal Code with the aim to protect migrant workers and other vulnerable workers who may be discriminated against at work and put in an unequal position due to their ignorance, lack of understanding, or other circumstances that make them vulnerable (HE 103/2014vp, 12–13).

Extortionate work discrimination refers to a situation where, if in a case of work discrimination, a job applicant or an employee is placed in a considerably inferior position through the exploitation of the job applicant's or employee's economic or other distress, dependent position, lack of understanding, thoughtlessness or ignorance. The provision has been used in Finland as a parallel provision to the crime of human trafficking, for example in situations where the evidence has not substantiated a conviction on trafficking for forced labour.

Although the provision has been in use since 2004, its application has been considered problematic, as the crime requires a presumption of discrimination specified by law, such as nationality or ethnic origin. This has led to difficulties in proving the causal link between a disadvantaged position and a ground for discrimination e.g., in situations where all employees of a company are foreign nationals, but only some of them receive excessively low wages. The aim of the provision on extortionate work discrimination is primarily to protect the principle of equality, rather than prevent the exploitation of persons in a weaker/inferior position. (Oikeusministeriö 2025, 49–51; Kimpimäki, 2021; Koivukari et al. 2022.)

The Finnish Ministry of Justice has reviewed the current provisions on labour exploitation in the Criminal Code, in particular extortionate work discrimination, and developed proposals to introduce stricter penalties. The Ministry of Justice argues that the criminalisation of labour exploitation should not be tied to the requirement and grounds of discrimination, but rather to exploitation itself. Exploitation can occur without discrimination and vice versa. The working group therefore proposes that the provision of extortionate work discrimination be replaced by a new provision on usury in employment as well as aggravated usury in employment.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Corporate criminal liability and the imposition of a business prohibition would be extended to these crimes, and the sanctions would be stricter than for extortionate work discrimination. If the current proposal is adopted, the criminal code in Finland will be amended so as to impose penalties for labour exploitation that is less severe than human trafficking, regardless of whether the act is in fact discriminatory. (Oikeusministeriö 2025, 49–51.) Usury in employment would be defined as:

> **An employer or their representative who, by exploiting an employee's financial or other distress, dependent position, lack of understanding, thoughtlessness, or ignorance in the context of an employment relationship, obtains or represents for themselves or another a financial benefit that is clearly disproportionate to the compensation, shall be sentenced for usury in employment to a fine or imprisonment for up to two years.**

Criminal liability would require that the perpetrator exploits the victim's financial or other distress, a dependent position, lack of understanding, thoughtlessness, and ignorance. There is however overlap between the elements of usury in employment and the crime of human trafficking. The means listed under the human trafficking provision also include the exploitation of another person's dependent position. The Ministry of Justice in its proposal however argue that the provisions concern different types of acts: human trafficking involves more comprehensive psychological or physical control over a person, which affects the victim's actual freedom of action while the provision on usury in working life is a labour offense, primarily applicable in cases concerning wage payment and compliance with working hours. (Oikeusministeriö 2025, 81–88.)

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

While the law is yet to be adopted and implemented, it is an attempt to, one the one hand, clarify the current criminal provisions applicable to labour exploitation, and on the other, to address impunity. The difference between usury in employment and the human exploitation provision in Sweden and Denmark is that the Finnish legislative proposal focuses on the financial benefit stemming from the exploitation, rather than defining the crime in terms of exploitation in forced labour or in work under clearly unreasonable conditions, as is the case in Sweden, or under conditions that are manifestly unreasonable, as in the case of Denmark. It remains to be seen whether this is a more successful route to address exploitation, but it is expected to simplify the work of inspection authorities and law enforcement in Finland, and lead to better access to justice for victims.

Criminalisation of human exploitation

BOTH SWEDEN and Denmark have criminalised the offence of "human exploitation". Sweden in 2018 (1962:700, chapter 4, section 1 b) and Denmark in 2022 (section 262b of the Danish Penal Code) as a response to the high threshold in applying the human trafficking provision in instances of labour exploitation. The provision of human exploitation is aimed to enable criminal justice responses in cases where the criteria of human trafficking are not met. However, the provision has been enforced very rarely in either country. In Sweden, from the introduction of the law until 2023, over 300 police reports were made, but only seven cases of human exploitation concerning labour exploitation were prosecuted, resulting in three convictions (Johansson 2024). In Denmark the provision has not yet been used in cases concerning labour exploitation according to our sources. There is also a law proposal in Norway concerning the criminalization of human exploitation, but the proposal is still under review (Regjeringen 13.2.2024).

The threshold to prosecute for human exploitation remains high (Schoultz & Muhire 2023). There is a need to ensure that the existing provisions are fully utilised. Otherwise, there is a risk that the scope narrows even further of what is understood to fulfill the serious crimes that exist in the labour market, such as human exploitation. (Ibid.)

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Migrant Worker Protection and Prevention

Facilitating the reporting of exploitation and informing the workers of their rights

ALTHOUGH MANY victims of labour exploitation in the Nordic countries have a residence permit, a proportion of workers have worked without a work permit or, in the case of EU citizens, without registering in the country. The situation is particularly difficult for undocumented workers, as reporting labour exploitation to the authorities carries a high risk of deportation from the host country.

Moreover, it is evident that migrant workers lack information on their rights and obligations, terms of employment, correct wage levels and options where to seek assistance if problems occur. In line with the recommendation from the EU Agency for Fundamental Rights (FRA), governments should ensure that labour inspections and other workplace audits or monitoring operations prioritise the enforcement of working conditions rather than immigration control and that disclosing exploitation does not lead to deportation (FRA 2021).

The focus group participants in the Nordic countries confirmed that even migrant workers residing in the host country with a valid residence permit may be afraid to report exploitation and discrimination. This fear stems from the risk of losing their job, which in turn may lead to the loss of their work permit if they are unable to secure new employment. Therefore, it is important to provide information to migrant workers in multiple languages and formats and offer low threshold services which allow migrant workers to anonymously consult professionals without the fear of deportation or losing their job. The importance of sharing information, both orally, and on paper, was raised in several of the Nordic focus groups.

> **During the inspection, when we explain what the working hours and wages are in Finland, it might already spark a thought, like, wait a minute, maybe working 12 hours a day every day isn't actually OK.**
>
> — Labour inspector, Finnish focus group discussion

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

There are several examples of good practice of sharing information to migrant workers at workplaces:

- **The Danish Centre against Human Trafficking (CMM) together with a group of authorities has created a small card to give to vulnerable workers on inspections.** The card includes a QR code that goes to the CMM website and provides information in eight different languages. According to representatives of CMM, there are many self-referrals from persons contacting the CMM. Not all of them come through the QR-code, but some simply google concepts such as "bad working conditions" and thus end up on the CMM website. (CMM 2019; 2025.)

- **The Danish Working Environment Authority has launched an online guide on workplacedenmark.dk** to strengthen foreign employees' understanding of workplace standards and help them cooperate effectively with employers on creating a safe working environment. The guide explains what employees can expect in terms of health and safety, including proper instruction and access to necessary protective equipment, and provides advice on what to do if conditions are inadequate.

- **The Finnish** occupational safety and health inspectors hand out information during inspection visits, including contact details to Victim Support Finland.

- **Victim Support Finland offers specialised services** for victims of trafficking or labour exploitation and information in several languages, see: Every foreigner has the same rights at work as Finnish citizens – YouTube.

- **There are also several apps** in Finland for migrant workers informing them about their rights, including the Work help Finland app Work Help Finland – Ministry of the Interior and the Hermes app for seasonal workers Hermes App – Industrial Union.

- **The Norwegian Labour Inspection Authority informs migrant workers** about their right both in inspections and through different guidance channels. In

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

addition to providing verbal information, they often distribute written materials or QR codes linking to multilingual information about rights online. (Arbeidstilsynet 2025.)

- **The Norwegian Labour Inspection Authority** has also conducted a targeted online advertising campaign aimed at workers in Norway who speak Lithuanian, Vietnamese, Polish, Romanian, Bulgarian and Arabic, many of whom work in sectors with minimum wages and may be unaware of their rights. The ads, delivered through social media, included videos and images with messages about wages, minimum pay, employment contracts, working hours, and work environment, along with contact information to the authority. The campaign reached over 318 000 people in the target groups. (Arbeidstilsynet 2025, 129.)

Social services' work and responsibility to support exploited workers should be strengthened, while civil society's resources and opportunities for cooperation with authorities should also be enhanced.

Facilitating better access to remedy and claiming unpaid wages

IN PRINCIPLE, exploited migrant workers have access to multiple forms of remedy, but in practice it is often very difficult for workers to access these (Haapasaari et al. 2024). There exist numerous barriers that hinder exploited migrant workers from pursuing existing grievance mechanisms or measures, including lack of awareness of their rights. When they are able to access grievance mechanisms, it is often victim support providers, civil society organisations and trade unions that facilitate their access to remedy by sharing information but also by assisting them in concrete ways (ibid.). Haapasaari et al thus make three recommendations: 1) states must secure sustainable funding for the work of NGOs and local and regional actors that support exploited workers in accessing remedies, 2) information must be shared to migrant workers about existing mechanisms, and multi-actor cooperation must be strengthened to facilitate better access to remedy, and 3) businesses must strengthen their role in providing remedies for exploited workers, including paying unpaid wages and recovering recruitment fees (ibid., 10–13).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

There are several concrete examples from the Nordic-Baltic region regarding measures that support exploited migrant workers' access to remedies. These include initiatives by NGOs, for example by Victim Support Finland in providing assistance and guidance to victims of trafficking and related exploitation as well as work of the Salvation Army in Sweden and Norway in supporting victims of labour exploitation.

> **We need legal aid for the persons not part of a union. Victim Support Finland is a very good practise, because I think what they're doing is really kind of instrumental. So having this kind of low threshold offer for these persons, giving them advice without having to go to authorities, but having something in between, I think is very interesting and something that we were at least very inspired by.**
>
> — Government agency representative, Danish focus group discussion

As pointed out by the Danish focus group participant, the advantage of services provided by NGOs is that they are low-threshold and can be accessed also anonymously by persons who are afraid of authorities and the consequences of reporting their situation or making a claim for their wages.

In the Nordic context, also trade unions play an important role in supporting workers to claim their unpaid salaries. Trade unions can engage in negotiations with employers, provide legal advice and litigation in court for workers, and also engage in blockades and media attention. (Haapasaari et al. 2024, 156–157.) They can negotiate issues related to undue wages directly with the employer, or via employer's associations or take cases to labour courts if they concern a breach of a collective agreement, or to other forms of arbitration if they concern interpretation of collective agreements. For example, Denmark, it is possible to take cases of underpayment to industrial arbitration, which is a contractual dispute resolution mechanism agreed upon by the social partners.[6]

6 Industrial action and disputes in Denmark | Eurofound.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

CASE EXAMPLE

Arbitration in Denmark

AN INDUSTRIAL ARBITRATION under the Danish Building and Construction Agreement ruled that a company had underpaid its foreign employees by failing to compensate them for all hours worked. The company did not provide the required documentation during the process and withdrew from further participation. Based on credible testimony from 14 employees and supporting evidence, the arbitration concluded that the company breached the collective agreement and ordered it to pay DKK 7.5 million to the union. (Dansk Industri 2025.)

IN THE Nordic countries, there are differences in how trade unions address exploitation of migrant workers, as many unions require a certain membership period before providing full membership benefits. Contrary to the more traditional unions, the Syndicalist union (SAC) in Sweden provides retrospective assistance to migrant workers and has also been relatively successful in supporting workers claim their unpaid wages, including in the Labour Court (ibid., Schoultz & Muhire 2024, 76–78). Without the support of trade unions, it would be very difficult for migrant workers to access e.g., the Labour Court, but at the same time, migrant workers may not find it worthwhile to pay membership, especially if assistance is only provided after a certain qualifying period. To resolve this, there could be different categories of trade union membership especially designed for migrant workers, in particular seasonal workers or others working on a temporary basis, who might otherwise not be able or willing to join the union (Haapasaari et al. 2024, 113–114).

In Finland, two trade unions have recently established specialised units to focusing on migrant workers. The Industrial Union's Foreign Labour Unit and the Unit for International Labour at the Finnish Construction Trade Union provide information to migrant workers and employers, train trade union representatives and provide assistance to workers (Tekijä 13.8.2024; Rakennusliitto 5.8.2025). The Finnish Construction Trade Union also engages in direct negotiations with employers and cooperates closely with the Confederation of Finnish Construction Industries in settling disputes concerning migrant workers (Haapasaari et al. 2024, 63).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Another mechanism to access unpaid wages are specialised labour dispute committees, which exist in both Estonia and Lithuania.

The Estonian labour dispute committee is an extrajudicial, impartial authority for resolving disputes between employees and employers. While it is a quicker and easier process than a criminal or civil court case, the burden of proof and the language requirements – there is no interpretation – may limit migrant workers' access to remedy through the labour dispute committee (Haapasaari et al. 2024, 172–174). In Lithuania there are 19 labour dispute committees that handle disputes between an employer and an employee, most often concerning unpaid wages. The committees consist of representatives of both employers and trade unions. In 2022, one fifth of cases dealt with migrant workers. (Haapasaari et al. 2024, 176–177.)

Nordic countries also have wage guarantee mechanisms, which can be used to claim unpaid wages if an employer is insolvent or has declared bankruptcy.

To claim unpaid wages, workers need to substantiate their claim with sufficient documentation. However, there are also recorded problems with the wage guarantee mechanisms. In Norway, the processing times are very long, yet there is a 12-month cut-off time for such payments.[7] In Finland, claims must be submitted within 18 months of the end of the employment relationship, and it also applies to undocumented workers. (Haapasaari et al., 2024, 57; 106.)

The EU Employer's Sanction Directive offers possibilities to enhance compensation for undocumented migrant workers but also to sanction employers who do so by use of financial sanctions in Finland and Sweden.[8] According to Finnish Employment Contracts Act Chapter 11a, if an employer has hired a person who does not have the right of residence in Finland, the employer may be subject to a penalty fee ranging

7 The cut-off date refers to the date on which the petition for commencement of bankruptcy proceedings was received by the district court, see: www.nav.no/lonnsgaranti/en.

8 Denmark has opted out of the Directive, while Iceland and Norway are not party to it as they are not EU members.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

from €1,000–€30,000. So far, the Finnish Immigration Service (Migri) has imposed a penalty fee on only one employer. In Sweden, while the penalty fee is used quite often, the possibility to claim unpaid wages is seldom used, and workers are rarely informed about the possibility to claim wages via this legislation (Johansson 2024). In the Netherlands and Belgium, the Employer's Sanction Directive is implemented in a manner where undocumented workers who have been exploited are automatically assumed to have worked a minimum of three months (Belgium) or six months (Netherlands) when the authorities calculate and compensate unpaid wages for undocumented exploited workers (Weatherburn & Wintermayr 2021, 81). The Nordic countries should therefore strengthen the implementation of the Employer's Sanction Directive.

Strengthening residence permit options

IN THE Nordic focus group discussions, the issue of residence permits for exploited migrant workers was brought up repeatedly as a challenge, but also as a solution to enable exploited workers to find new employments. While tying the residence permit to a single employer increases vulnerability, because complaining about exploitative situations would lead not only to losing their job, but also losing their residence permit, opening the work permit to more sectors would allow more options for the worker to find decent employment.

As an example of this, in 2021, the Aliens Act of Finland was amended to include the possibility of issuing a residence permit in cases where an employer has exploited their worker. With this one-year extended permit or certificate of expanded right to work, a migrant worker with a work permit in Finland who has been exploited at work can switch to another employer without restrictions over their sector of work (Aliens Act, chapter4, section 54 b). In 2022, a total of 17 such permits were issued, while 27 permits were issued in 2023 and 24 permits in 2024. By May 2025, 12 permits had been issued in 2025 (Lampinen 2025).

The aim of this provision is to support victims of exploitation even when a criminal investigation has not been started or does not proceed. When the worker applies for this permit, the Finnish Immigration Service will assess whether there are reasonable grounds to suspect that their employer has neglected their employer obligations to a significant degree or otherwise exploited them.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

According to the Finnish Immigration Service, significant negligence by an employer can be, for example:

- **making the** worker work unreasonably long hours or an unreasonable number of hours;
- **lack of** days off and lack of holidays;
- **not paying** salary;
- **considerable underpayment** or taking back salaries already paid to you;
- **neglecting occupational** safety or making you work in dangerous working conditions.

Exploitation by employer can include for example:

- **threats over** the life or health of the worker or their family;
- **threats to** make the authorities cancel the worker's residence permit or remove them from the country;
- **confiscation identity** document or controls over the worker's bank account, tax card or other important documents;
- **isolating the** worker from other people by requiring that they live in premises chosen by their employer;
- **restricting phone** use in the worker's free time;
- **not allowing** the worker to choose where they eat their meals
- **and restrictions** over worker's social relations in some other way. (Migri n.d.)

However, the low number of granted permits indicates that although the Immigration Service has made efforts to inform a significant number of clients about this possibility, the cost of the application may be a hindrance, or victims of exploitation do not recognize their own situation as exploitative (Haapasaari et al. 2024, 58). A participating expert in one of the reference group discussions raised the need to also introduce a residence permit option that would allow for people to stay while they seek compensation, either in a criminal or civil process.

In Sweden, victims of human trafficking can be granted a 30-day reflection period and given a temporary residence permit (Immigration Act). The prerequisite is that there is a police

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

investigation ongoing, but if the investigation is discontinued the permit will be revoked. In 2023, the Swedish Migration Agency granted 71 temporary residence permits to persons presumed to be victims of human trafficking and/or human exploitation (Myndigheter mot arbetslivskriminalitet 2024, 15). The temporary residence permit gives the right to work in Sweden legally. As was noted above, these reflection periods are rarely granted to exploited workers. In Finland, a reflection period can be granted to presumed victims of trafficking for one to six months if they do not have a valid residence permit in Finland. The threshold to apply the reflection period is relatively low, and there is not a requirement for an ongoing criminal investigation, as the idea is for the victim to recover and consider whether they are willing to cooperate with law enforcement in the first place (Jokinen et al. 2023).

Also, in Iceland a group of exploited migrant workers were granted special residence permits, allowing them to remain in the country and to seek new employment. However, the victims received assistance as a result of major media publicity and public debate, and it remains to be seen whether similar assistance and residence permit options will be made available also to other exploited workers (email communication with Icelandic trade union representative, 6 August 2025).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

CASE EXAMPLE

Large case of suspected trafficking in human beings among Vietnamese restaurant workers in Iceland

IN MARCH 2024, the police raided a man of Vietnamese origin, who owned several restaurants, cleaning companies and a hotel in Iceland. The police found between 30-40 potential victims of trafficking working on temporary work permits. The victims have paid very large sums to secure the job, however, proving that is difficult since there is not much documentation of the transactions. (Icelandic focus group 18.3.2025; Nordic Labour Journal 25.9.2025.)

The trade unions, municipalities, and the directorate of labour formed and informal group to discuss the case. They hold 16 open meetings to the potential victims, where they provided information, support, and guidance on topics such as labour rights. (Icelandic focus group 18.3.2025; Nordic Labour Journal 25.9.2025.)

According to a trade union representative, one of the main concerns of the victims has been ensuring their work and residence permits. In early 2025, they have received permits that allow them to work at any jobs in Iceland and allow their families to stay in the country as well. According to an authority representative, the Directorate of Labour had a central role in getting new jobs to the victims. (Icelandic focus group 18.3.2025)

The police investigation is still ongoing, according to an interviewed authority representative, the police investigation is going "slow but steady" since the police has very little resources. Hearings of the victims have been informative, and they seem to feel safe and willing to talk to the police. The meetings held by the unions and other actors have thus been seen to be helpful in establishing trust among the victims. (Icelandic focus group 18.3.2025)

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

The role of businesses and public procurement entities in countering exploitation

Use of labour clauses to ensure proper working conditions in public procurement contracts and limiting the supply chain

ONE WAY to ensure proper working conditions is to make sure that public procurement contracts are not awarded to companies which exploit their workers. The procuring bodies should use clauses in their contracts to confirm that suppliers and subcontractors apply pay and other employment conditions according to collective agreements of the industry. In Denmark, the use of labour clauses in government procurements is mandatory. Clauses are also used by larger municipalities, even though they are not required by law (Regeringskansliet 2023, 255).

For example, the municipality of Copenhagen includes labour clauses in all its contracts. The clauses state that the working conditions must meet the nationwide collective agreement for the same type of work, the municipality has the right for physical workplace visits and require employment and salary documentation from the workers. They establish the main contractor as a responsible party, but do not limit the number of subcontractors. The municipality of Copenhagen also has a task force against social dumping that conducts follow-ups of labour clauses in procurement agreements. They use a risk-based model to recognize companies that should be investigated and conduct unannounced visits to these workplaces (Regeringskansliet 2023, 256).

The labour clauses have been reviewed by the Danish National Audit Office (Rigsrevisionen) who however found that compliance with the terms of the agreement was low. As a response, the Danish government introduced a new state control unit, the Statens Kontrolenhed for Arbejdsklausuler. The unit's task is to supervise that private suppliers and subcontractors comply with labour clauses on working conditions and wages and check government framework agreements. The unit also conducts random inspections that are guided by risk assessments in a similar method to the municipality of Copenhagen (Regeringskansliet 2023, 258).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

GOOD PRACTICE

Guide for public procurement actors to prevent labour exploitation

HEUNI HAS CREATED a practical guide for public procurement actors to prevent labour exploitation in local supply chains (Lietonen & Ollus 2021). The HEUNI guide focuses on four concrete steps that public procurement actors can undertake: 1) commitment throughout the organisation to preventing local human rights problems and allocation of necessary resources to ensure this; 2) planning and preparing the procurement so that the market analysis and market dialogue include concrete actions to prevent and address exploitation; 3) include clear suitability requirements for the supplier, obligatory contract terms and requirements for supervising subcontracting to prevent labour exploitation, and; 4) monitoring the contract, including working conditions (ibid., 28–52).

ANOTHER WAY of addressing work-related crime, in particular labour exploitation is limiting the supply chain in contracting. This was raised in the focus group discussions in both Sweden and Denmark, where both trade union and business representatives emphasised that a limitation on the number of tiers of subcontractors, e.g., in the construction sector, would make monitoring easier, and could also prevent many forms of work-related crime.

Promising initiatives in the construction sector

SOCIAL PARTNERS, i.e. trade unions and employers' associations, play an important role in addressing work-related crime and labour exploitation. A promising example in Sweden is the industry-wide initiative Svensk Byggkontroll, which aims to address fraud and work-related crime in the Swedish construction and installation industry. Svensk Byggkontroll carries out reviews on companies with the aim of identifying unscrupulous actors.[9] The primary mission of Svensk Byggkontroll is to ensure that companies pay correct wages and compensations to employees. Their work procedures involve requesting company documents, identifying errors, giving companies the chance to correct those errors, verifying that corrections have been made, assisting companies with regulatory compliance, collaborating with employer organisations, and informing authorities when necessary. By systematically carrying out so-called advanced reviews on companies, Svensk Byggkontroll can find and remove

9 Engelska – Svensk Byggkontroll.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

criminal actors from the industry. Larger companies that are members of an employer organisation can let elected union representatives carry out the advanced reviews, who will then be educated by Byggnads in their methodology.[10]

CASE EXAMPLE

Svensk Byggkontroll and remedies to workers in Sweden

AT LEAST ONE case with a successful outcome has been reported by Svensk Byggkontrol. An inspection by union representatives at Skanska in Skåne revealed that employees had not received proper overtime pay, reduced working hours, compensation for weekend work, or holiday pay. After the issue was discovered, the company was given the opportunity to correct it, which they did. Employees at the company received paybacks of nearly 4 million SEK. (Byggnads 5.9.2024.)

FAIR PLAY Bygg Norway[11] is a Norwegian organisation that coordinates local initiatives with the common goal of revealing and combating work-related crime. Fair Play Bygg follows up and investigates tips received from private individuals, various actors in the industry, and others. If there are clear indications of violations of law, Fair Play Bygg gathers additional information and documentation and forwards the tips to public regulatory authorities. In addition, the organisation prevents work-related crime by monitoring the industry and the private market. They assist private individuals, businesses, buyers, and others in distinguishing between legitimate actors and those who break the law. Fair Play Bygg also informs workers about their rights. Furthermore, Fair Play Bygg documents labour market crime and quality-assures tips and reports of legal violations. (Fair Play Bygg Oslo og omegn, n.d.) In 2024, Fair Play Bygg Norway submitted over 1 000 reports of work-related crime to authorities, marking a record number. More than half of the submitted reports concerned wage theft, misuse of credit, tax evasion and severe exploitation. According to the regional unit of Fair Play Bygg Oslo og omegn's 2024 annual report, wage theft occurs on a significantly larger scale than what is reflected in their reported statistics (Fair Play Bygg Oslo og omegn 2024, 6).

10 svenskbyggkontroll.se.

11 fairplaybygg.no.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

CASE EXAMPLE

Fair Play Bygg support to worker in Norway

ONE EXAMPLE OF Fair Play Bygg's work is a case where a man from Central Asia was manipulated by his employer into registering a fraudulent company in his own name. He was unaware of the implications and was later held responsible for the company's debts and legal violations. Fair Play Bygg helped the man by collecting almost 300 pages of evidence, including bank records and messages with his former boss. Together with Fair Play Bygg, he reported the employer for, among other things, wage theft and exploitation of vulnerable workers. (Frifagbevegelse 28.2.2024.)

FAIR PLAY Bygg also operates in Sweden. Established in 2016 as a joint initiative between Stockholms Byggmästareförening and Byggnads Stockholm-Gotland, Fair Play Bygg Sweden aims to combat labour market crime in the construction sector. However, its operations are currently limited to the Stockholm-Gotland region. Fair Play Bygg Sweden receives tips, after which they gather additional information to support the case and forwards the findings to the Police, the Swedish Tax Agency, or the Swedish Work Environment Authority for further investigation. (Fair Play Bygg Sverige, n.d.) Since its establishment, Fair Play Bygg Sweden has received over 2 554 reports about suspected criminal activity on construction sites in Stockholm. Of the tips received, approximately 1 470 cases have been forwarded to authorities for further investigation. (Fair Play Bygg Sverige 2024, 5.) Fair Play Bygg Sweden believes that the solution to these issues lies in increased cooperation between authorities to reveal and combat labour market crime (Fair Play Bygg Sverige, n.d.).

In Finland, The Confederation of Finnish Construction Industries (Rakennusteollisuus RT 2024) as The Finnish Construction Trade Union (Rakennusliitto) work closely in combating and preventing labour exploitation in the construction sector. As an example, a new clause has been added to the collective agreement for the construction sector in 2025–2028, which will allow the main contractor to ultimately be held responsible for the wages of subcontractor employees for the entire duration the employee works at the client's site, but for no longer than six months. In order to do so, the following conditions must be fulfilled:

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

- **The claims** arise from wages or wage components that fall below the provisions of the applicable collective agreement or labour legislation.
- **The employee** was unaware of this or was otherwise in a position where they could not assert their rights under the collective agreement.

Such claims must be reported to the main contractor without delay upon discovery, and no later than the 15th calendar day after the employee has ceased working at the site. If the client is not the main contractor of the site, they must promptly provide a report on the matter, including corrective actions and their timelines, to the main contractor. The main contractor is responsible for ensuring that the reports and corrective actions are implemented throughout the entire contracting chain. (Talonrakennusteollisuus & Rakennusliitto 2025, 74–75.)

GOOD PRACTICE

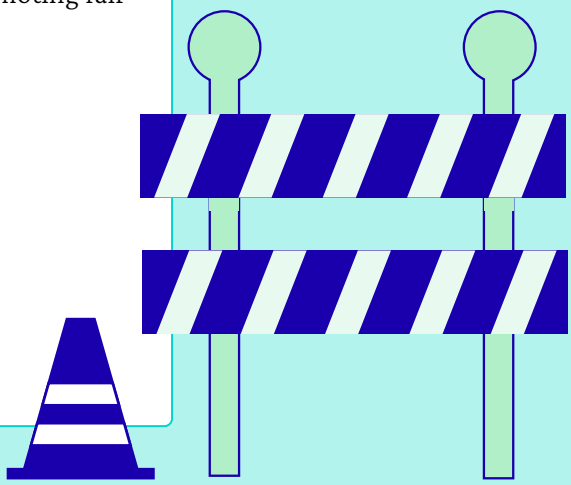
A common standard for the prevention of labour exploitation in Finland

IN 2024, RAKENNUSTIETO, a leading provider of construction information in Finland published a common standard to prevent labour exploitation for construction companies and other organisations that contract for construction projects. Rakennustieto maintains a "RT Building Information File" which contains standards, regulations and products files for participants in building projects on a variety of topics from design, repair and maintenance to contract building. The common standard for prevention of labour exploitation was developed in collaboration with HEUNI and The Confederation of Finnish Construction Industries, as well as The Finnish Construction Trade Union and several leading real estate developers and main contractors. The standard went through an open public consultation and was finalized with support from the Finnish Labour Inspectorate and Victim Support Finland. It outlines key facts about features of labour exploitation and other related phenomena as well as the laws regarding the obligations of main contractors, buyers, and companies. The instructions detail how to detect labour exploitation and provides preventative measures for buyers and practical guidance for occupational safety and health inspectors. It also details corrective measures when labour exploitation has already been detected at the construction site. With the help of the standard, companies can promote healthy competition and fair working conditions as well as help prevent grey market and economic crime. (RT 12.6.2024; RT 15.10.2024.)

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Key findings from part III

- **In the Nordic countries,** national policies and labour inspection systems are central tools for preventing labour exploitation and work-related crime, but their effectiveness depends on adequate resources, coordination, and risk-based targeting.
- **Expanding the role of labour inspectors** and social partners, and improving communication with workers during inspections, including through interpretation, strengthens detection of cases of labour exploitation and facilitates better enforcement.
- **Criminal law** is increasingly used to address labour exploitation, with trends toward criminalising human exploitation, extortionate work discrimination or wage theft, though implementation varies across the Nordic countries.
- **Migrant workers** remain particularly vulnerable to labour exploitation, highlighting the need for accessible reporting channels, better information on rights, and residence permit options that reduce dependency on exploitative employers and enable finding fair employment.
- **Businesses and public procurement** entities play a key role in prevention of labour exploitation with labour clauses and sector-specific initiatives, such as in construction, showing promise in promoting fair working conditions.



CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Conclusions

This report explores the concrete links between work-related crimes, work environment risks and labour exploitation in the Nordic countries based on previous literature as well as focus group discussions and consultations with Nordic labour inspectors, police representatives, trade unions, victim service providers and NGOs. The focus of the report is on labour exploitation as a specific area of work-related crime.

THE REPORT demonstrates that the Nordic countries have applied different concepts to address labour market breaches and crimes in the labour market. The concepts include social dumping, work-related crime, economic crime, and human trafficking. The chosen conceptual approach shapes national policies and enforcement practices across the Nordic countries. In Norway and Sweden, the strong emphasis on work-related crime has resulted in the development of multi-agency cooperation structures to address such crimes. In Iceland, the cooperation between social partners and government agencies to oversee the labour market is formalised in law, while in Finland a specific focus on labour exploitation has led to relative successes in applying the criminal law. In Denmark, the predominant focus on social dumping has recently shifted towards a stronger focus on work-related crimes and subsequent government emphasis on addressing such crimes. These conceptual differences subsequently influence resource allocation, also resulting in inconsistent responses at the national, as well as at the broader Nordic level.

The mandates of labour inspectorates and work environment authorities vary significantly among the Nordic countries.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Finnish and Norwegian labour inspection authorities have broad powers to monitor wages and terms of employment, while Swedish and Danish authorities are limited to occupational health and safety issues. Iceland has recently introduced a hybrid model to formalise the cooperation between labour authorities and social partners in joint monitoring working conditions. However, the existing limitations in mandates in some Nordic countries restricts the ability of labour inspection and work environment authorities to detect labour exploitation beyond mere safety violations or work environment risks.

Previous research shows that occupational safety and health breaches are not isolated problems; they often signal deeper patterns of work-related crime and also labour exploitation. In some cases, unsafe working conditions are part of a deliberate business model that prioritises profit over worker protection and is compounded by reducing costs while at the same maximising revenue generation. Occupational safety and health breaches can thus serve as a precursor to, and indicator of further violations. Non-unionised migrant workers are often more vulnerable to such unlawful practices and may face exploitative working conditions due to their more precarious status in the labour market, lack of options and lack of information on their rights.

The research demonstrates that while social partners remain central to the Nordic labour model, (non-unionised) migrant workers often fall outside union protection, which primarily targets existing members.

Barriers such as language difficulties, lack of information about the benefits of union membership, perceived high costs, precarious employment, temporary work arrangements, and fear of retaliation discourage migrant workers from joining unions. At the same time, there are promising examples across the Nordic countries where unions have played an active role in combating labour exploitation. These include providing advice, legal counsel and guidance to non-unionised workers and negotiating compensation for unpaid wages with employers. Looking

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

ahead, strengthening union outreach, improving accessibility, and building trust are essential steps to ensure fair treatment and protection for all workers.

Recent years have also seen increased focus on developing cooperation between different authorities to address work-related crime across the Nordic countries. Formalised multi-agency cooperation, such as the Norwegian and Swedish A-krim centers, shows promise in tackling work-related crime through joint inspections and information sharing. However, current efforts seem to focus primarily on tackling financial crimes against the state rather than victim protection and wage recovery.

Access to justice for exploited migrant workers remains limited in the Nordic region in particular if they are not members of trade unions.

Remedies for unpaid wages exist in theory but are rarely accessible in practice unless workers receive assistance and guidance from trade unions, legal aid, or civil society actors. Further barriers to accessing remedies and unpaid wages include high legal costs, lack of information and awareness of rights, insufficient documentation e.g. regarding working times, and fear of deportation as a consequence of reporting to the authorities. Structural barriers must therefore be addressed to make existing remedies more accessible to aggrieved migrant workers.

The study shows that improved identification of labour exploitation requires stronger inspection systems. Expanding the role of labour inspectors, alternatively of social partners for instance in line with the Icelandic hybrid model, improving communication with workers, including through interpretation, and adopting risk-based targeting of inspections and monitoring efforts can enhance detection of cases of labour exploitation and facilitate better enforcement. Adequate resources and coordination are critical for success. Nordic countries should also enhance the powers to sanction and issue administrative fines to employers who breach occupational health and safety issues or terms of employment.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Criminal law is increasingly used to address labour exploitation in the Nordic countries.

Most Nordic countries have introduced parallel offences which can be used to prosecute cases which do not fulfil the elements of more severe cases of exploitation amounting to human trafficking for the purpose of forced labour. Finland has criminalised extortionate work discrimination, while Sweden and Denmark have criminalised human exploitation, and Norway has introduced a provision on wage theft. However, implementation of these provisions remains uneven across the Nordic countries, resulting in a high attrition rate as few cases lead to convictions. This is compounded by a lack of resources, awareness and prioritisation as well as challenges regarding the collection of evidence.

Prevention efforts must also involve businesses and public procurement. Private sector actors, particularly in high-risk sectors like construction, play a key role in addressing work-related crimes through labour clauses in contracts, and responsible procurement practices. Several promising examples of collaboration between social partners exist in the Nordic countries to address and tackle work-related crime and labour exploitation, particularly in the construction sector. Public procurement can furthermore set standards that promote fair working conditions and ensure that collective agreements are upheld in publicly funded procurement.

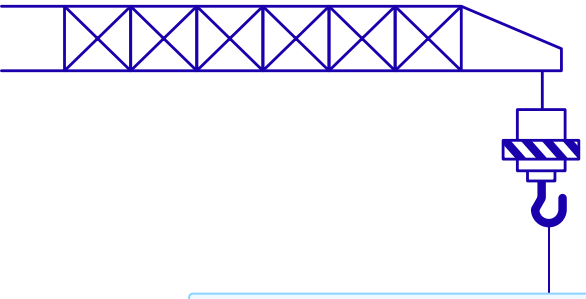
The research shows that despite strong Nordic labour market traditions, greater attention is needed to safeguard the rights of migrant workers who remain at high risk of labour exploitation and poor working conditions, including occupational health and safety breaches. Encouraging workers to report exploitative practices is particularly challenging when disclosure can lead to job loss and the revocation of residence permits, while exploitative employers simultaneously often continue their business model by recruiting new workers to be exploited. To break this cycle, it is essential to create accessible and safe reporting channels, provide clear and practical information on rights to workers in multiple languages and formats, and introduce residence permit options that reduce dependency on exploitative employers and facilitate finding decent work. These measures are critical to empowering migrant workers, increasing trust in institutions, and preventing work-related crimes and labour exploitation.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Concrete recommendations

As the report shows, many promising initiatives are already ongoing in the Nordic region. The following recommendations provide input for governments and other actors in order to strengthen actions against labour exploitation. Overall, despite many positive recent developments, all Nordic countries should strengthen their political prioritisation to counter labour exploitation.





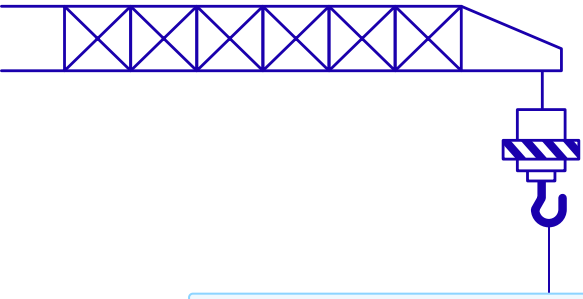
CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Strengthening institutional mandates and multiagency cooperation

- **NORDIC COUNTRIES ARE** encouraged to extend the mandate of labour inspectorates to explicitly include monitoring of employment terms for migrant workers, framing exploitation also as an occupational safety and health issue.
- **NORDIC COUNTRIES ARE** encouraged to improve multiagency cooperation, especially within A-krim centres, by enhancing information sharing and ensuring that victim rights are prioritized and upheld.
- **NORDIC COUNTRIES ARE** encouraged adopt a risk-based approach in inspections, prioritizing sectors and workplaces with high vulnerability indicators.

Enhancing legal and administrative tools

- **NORDIC COUNTRIES ARE** encouraged to further introduce and better implement existing criminalisations such as wage theft, usury in employment and human exploitation to ensure that the criminal law is adequately applied in cases of labour exploitation.
- **NORDIC COUNTRIES ARE** encouraged to strengthen enforcement sanctions for work-related crimes, including to introduce administrative sanction fees for violations like missing work schedule lists to deter lesser but systemic abuses.



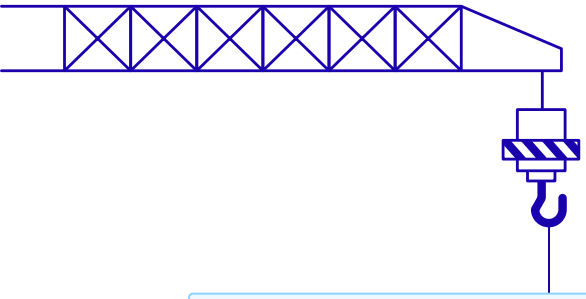
CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Improving access to justice and remedies for victims

- **NORDIC COUNTRIES ARE** encouraged to facilitate reporting mechanisms for exploited workers, including anonymous channels and multilingual support.
- **NORDIC COUNTRIES ARE** encouraged to ensure access to unpaid wages through simplified claims processes, and in the case of Finland and Sweden, ensure better enforcement of the EU Sanctions Directive.
- **NORDIC COUNTRIES ARE** encouraged to provide reflection periods for presumed victims of human trafficking to enable recovery. Countries should also introduce residence permit options for exploited migrant workers to ensure transition to safe employment.

Empowering workers and supporting trade union engagement

- **ALL KEY ACTORS** who may encounter exploited workers should prioritise workers' rights over immigration controls which could result in deportations before it has been established whether the workers are potential victims of trafficking.
- **NORDIC LABOUR INSPECTORATES** and other relevant organisations who encounter workers on inspections should engage workers during such inspections, give them information on their rights and encourage workers to keep personal records of working hours and conditions to support future claims. They should use interpreters and culturally sensitive approaches to build trust.
- **NORDIC TRADE UNIONS** should strengthen their engagement with migrant workers through outreach, legal aid, and inclusive organizing strategies.



CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Addressing structural and regulatory gaps

- **NORDIC COUNTRIES SUCH** recognize labour exploitation as both a criminal and labour market issue, ensuring it is not dismissed as mere wage disputes.
- **NORDIC LABOUR INSPECTORATES** should monitor and regulate work environment risks more effectively, especially those linked to stress and poor occupational health, which are also associated with labour exploitation cases.
- **NORDIC AUTHORITIES SHOULD** strengthen detection of schemes that obscure exploitation, such as subcontracting chains and bogus-self self-employment, and ensure they are ways to dismantle them for the benefit of the exploited worker.

Promoting responsible public procurement and business practices

- **NORDIC PUBLIC PROCUREMENT** bodies are encouraged to use labour clauses in public procurement contracts to enforce decent working conditions and accountability.
- **NORDIC BUSINESSES AND** public procurement bodies are encouraged to limit supply chain complexity to improve oversight and reduce opportunities for exploitation.
- **NORDIC COUNTRIES ARE** encouraged to foster cooperation among social partners to prevent exploitation through joint initiatives and sectoral agreements.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

References

Literature

A-krimsamarbeidet. (2025). Felles årsrapport 2024 for etatenes innsats mot arbeidslivskriminalitet. www.politiet.no/globalassets/tall-og-fakta/arbeidslivskriminalitet/felles-arsrapport-for-etatenes-innsats-mot-arbeidslivskriminalitet-2024.pdf

Andersen, S. K., & Pedersen, K. (2010). Social dumping: Overenskomster og lovregulering - baggrund og perspektiver. FAOS, Sociologisk Institut, Københavns Universitet. FAOS Forskningsnotat No. 110. faos.ku.dk/pdf/forskningsnotater/forskningsnotater_2010/Fnotat_110.pdf/

Andrees, B. (2008). Forced Labour and Trafficking in Europe: How People are Trapped in, Live through and Come out. Geneva: International Labour Office.

Alþingi (2024). Frumvarp til laga um breytingu á ýmsum lögum vegna samstarfs og eftirlits á vinnumarkaði (Þskj. 1354 — 909. mál). 154. löggjafarþing 2023–2024. www.althingi.is/altext/154/s/1354.html

Alþýðusamband Íslands (2019). Íslenskur vinnumarkaður 2019. Erlent launafólk og brotastarfsemi á vinnumarkaði. hdl.handle.net/10802/30467

Alþýðusamband Íslands (2023). Íslenskur vinnumarkaður 2023. Erlent launafólk og brotastarfsemi á vinnumarkaði. asi.is/wp-content/uploads/2024/06/islenskur-vinnumarkadur-2023.pdf

Allain J., Crane A., LeBaron G. & Behbahani L. (2013). Forced labour's business models and supply chains. Joseph Rowntree Foundation: York.

Aluehallintovirasto (2025). KHO: Woltin ruokalähetit ovat työsuhteessa, mutta työhön ei sovelleta työaikalakia. Tiedote. avi.fi/tiedote/-/tiedote/71189821

Alzoubi, Y., Locatelli, G., & Sainati, T. (2023). Modern Slavery in Projects: A Systematic Literature Review and Research Agenda. Project Management Journal, 54(3).

Arbeidstilsynet. (2025) Årsrapport – En analyse av Arbeidstilsynets innsats i 2024. www.arbeidstilsynet.no/globalassets/rapportar/arsrapport/arsrapport-2024.pdf

Arbeids- og inkluderingsdepartementet. (2024). Høringsnotat: Endringer i arbeidsmiljøloven. Regjeringen.no. www.regjeringen.no/globalassets/departementene/aid/dokumenter/2024/horingsnotat-endringer-i-arbeidsmiljoloven.pdf

Arbetsmiljöverket. (2023a, July 13). Fysiska arbetsmiljörisker.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Arbetsmiljöverket. (2023b, December 18). Kemiska och biologiska arbetsmiljörisker.

Arbetsmiljöverket. (2024a, July 5). Inomhusmiljö.

Arbetsmiljöverket. (2024b, January 4). Vanliga arbetsmiljörisker vid byddnads- och anläggningsarbete.

Arbetsmiljöverket. (2024c, January 4). Risk för belastningsskador.

Arbetsmiljöverket. (2024d, January 3). Organisatoriska och sociala arbetsmiljörisker.

Belloni, M., Carrino, L., & Meschi, E. (2022). The impact of working conditions on mental health: Novel evidence from the UK. Labour Economics, 76.

Benach, J., Muntaner, C., Delclos, C., Menéndez, M., & Ronquillo, C. (2011). Migration and "low-skilled" workers in destination countries. PLoS Medicine, 8(6).

Bengtsson, E. (2013). Swedish trade unions and European Union migrant workers. Journal of Industrial Relations, 55(2), 174.

Beskæftigelsesministeriet. (2021). Afrapportering fra de tværministerielle arbejdsgrupper om sårbare udenlandske arbejdstagere og bekæmpelse af menneskehandel. bm.dk/media/18480/afrapportering-fra-de-tvaerministerielle-arbejdsgrupper-om-saarbare-udenlandske-arbejdstagere-og-bekaempelse-af-menneskehandel.pdf

Beskæftigelsesministeriet. (2024). Aftale om styrket indsats mod social dumping. bm.dk/arbejdsomraader/politiske-aftaler/politiske-aftaler/2024/aftale-om-styrket-indsats-mod-social-dumping

Beskæftigelsesministeriet. (2025). Ny overenskomstordning for udenlandsk arbejdskraft og nye initiativer mod social dumping. BM.dk. bm.dk/nyheder/presse-meddelelser/2025/06/ny-overenskomstordning-for-udenlandsk-arbejdskraft-og-nye-initiativer-mod-social-dumping

Boufkhed, S. (2020). Labour exploitation as a social determinant of health: a structured conceptual framework focusing on migrants working in manual low-skilled jobs (Doctoral dissertation, London School of Hygiene & Tropical Medicine).

Boufkhed, S., Thorogood, N., Ariti, C., & Durand, M. A. (2024). 'They treat us like machines': migrant workers' conceptual framework of labour exploitation for health research and policy. BMJ Global Health, 9(2).

Brunovskis, A. & Ødegård, A.M. (2019). Menneskehandel i arbeidslivet. Fafo-rapport 2019:35. Oslo: Fafo.

Brunovskis, A. & Ødegård, A.M. (2022). Grov utnytting av utenlandske arbeidstakere: Gråsonen mellom det regulære arbeidslivet og menneskehandel. Fafo-rapport 2022:14. Oslo: Fafo.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Buller, A., Vaca, V., Stoklosa, H., Borland, R., & Zimmerman, C. (2015). Labour exploitation, trafficking and migrant health: multi-country findings on the health risks and consequences of migrant and trafficked workers. International Organization for Migration.

Byggeriets Samfundsansvar. (n.d.). Klausuler og dokumentationsredskaber. byggerietssamfundsansvar.dk/case/klausuler-og-dokumentationsredskaber/

CMM (2019). Avoid hidden forced labour: Guidelines for businesses and employers. www.cmm.dk/english/guidelines-for-businesses-to-avoid-hidden-forced-labour

CMM (2025). Statistik 2024: Menneskehandel i Danmark. Social- og Boligstyrelsen. www.cmm.dk/Media/638769423755666405/Statistik%202024.%20Menneskehandel%20i%20Danmark.pdf

Crane, A. (2013). Modern slavery as a management practice: Exploring the conditions and capabilities for human exploitation. Academy of Management Review, 38(1).

CSD (2019). Financing of organised crime - human trafficking in focus. CSD: Sofia. doi.org/10.13140/RG.2.2.36697.36961

Dansk Industri. (2025). Dømt til at betale 7,5 millioner for underbetaling af udenlandske medarbejdere. DI.dk. www.danskindustri.dk/vi-radgiver-dig/personale/nyhedsarkiver---personaleforhold/nyheder-personalejura/2025/5/domt-til-at-betale-75-millioner-for-underbetaling-af-udenlandske-medarbejdere/

Davis, T., & Haapasaari, S. (2024). Access to Effective Remedy and Grievance Mechanisms: a Brief Review of the Situation for Exploited Migrant Workers in Finland and Norway. Journal of Modern Slavery, Volume 9(1).

Eggen, F. W., Gottschalk, P., Nymoen, R., Ognedal, T. & Rybalka, M. (2017). Analyse av former, omfang og utvikling av arbeidslivskriminalitet (Rapport 69 2017). Samfunnsøkonomisk analyse. fafooestforum.no/publikasjoner/analyse-av-former-omfang-og-utvikling-av-arbeidslivskriminalitet

ELA (2025). Detecting and addressing labour exploitation. A guide for labour inspectors. European Labour Authority & European Union Agency for Fundamental Rights. fra.europa.eu/sites/default/files/fra_uploads/ela-fra-2025-guide-detecting-addressing-labour-exploitation_en.pdf

Estrada, F., Flyghed, J., Nilsson, A., & Bäckman, K. (2014). Why are occupational safety crimes increasing? Journal of Scandinavian Studies in Criminology and Crime Prevention, 15(1), 3–18. doi.org/10.1080/14043858.2013.864840

EUCPN. (2023). Toolbox on work-related crime. Labour exploitation and work-related crime: a problem analysis and prevention framework. The European Crime Prevention Network. eucpn.org/toolbox-workrelatedcrime

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

European Commission. (n.d.). The European Pillar of Social Rights: 20 principles. Employment, Social Affairs & Inclusion. Accessed 1.11.2025. employment-social-affairs.ec.europa.eu/policies-and-activities/european-pillar-social-rights-building-fairer-and-more-inclusive-european-union/european-pillar-social-rights-20-principles_en

European Labour Authority (ELA). (2024). Targeting key 'threat actors' to reduce work-related crime and undeclared work. Norway. www.ela.europa.eu/sites/default/files/2024-06/Good-practice-fiche-NO.pdf

Europol. (2024). Leveraging legitimacy: How the EU's most threatening criminal networks abuse legal business structures. Europol. www.europol.europa.eu/sites/default/files/documents/Europol_report_-_Leveraging_legitimacy_-_How_the_EU_most_threatening_crim_networks_abuse_legal_business_structures.pdf

Eurostat (2023). Trafficking in human beings statistics. ec.europa.eu/eurostat/statistics-explained/index.php?title=Trafficking_in_human_beings_statistics

Fair Play Bygg Oslo og omegn. (2024). Årsrapport 2024. fairplaybyggoslo.no/

Fair Play Bygg Sverige. (2024). Årsrapport 2024 .fairplaybygg.se/media/vrba41b5/fair-play-bygg-a-rsrapport-2024.pdf

Fair Play Bygg Oslo og omegn. (n.d.). Fair Play Bygg Oslo og omegn. fairplaybyggoslo.no/

Fair Play Bygg Sverige. (n.d.). About Fair Play Bygg. fairplaybygg.se/en/about-fair-play-bygg/

Floros, K. (2023). "Experiences, Exclusions, Expectancies": Discussing platform work and the Danish welfare state with workers, unions and scholars. Platform Labor. platformlabor.net/blog/experiences-exclusions-expectancies-discussing-platform-work-and-the-danish-welfare-state-with-workers-unions-and-scholars

FRA. (2015). Severe labour exploitation: Workers moving within or into the European Union. Publications Office of the European Union. fra.europa.eu/sites/default/files/fra-2015-severe-labour-exploitation_en.pdf

FRA. (2019). Protecting migrant workers from exploitation in the EU: workers' perspectives. European Union Agency for Fundamental Rights. fra.europa.eu/en/publication/2019/protecting-migrant-workers-exploitation-eu-workers-perspectives

FRA. (2021). Protecting migrant workers in an irregular situation from labour exploitation – Role of the Employers Sanctions Directive. European Union Agency for Fundamental Rights. fra.europa.eu/en/publication/2021/employers-sanctions-against-exploitation

FRA. (2024). How workplace inspectors can protect third-country workers' rights – Training manual. European Union Agency for Fundamental Rights. fra.europa.eu/sites/default/files/fra_uploads/fra-2024-workplace-inspectors-training-manual_en_1.pdf

Graham, I. D., Logan, J., Harrison, M. B., Straus, S. E., Tetroe, J., Caswell, W. & Robinson, N. (2006). Lost in knowledge translation: Time for a map? Journal of Continuing Education in the Health Professions, 26(1), 13–24.

GRETA (2023). Evaluation report on Iceland: Third evaluation round – Access to justice and effective remedies for victims of trafficking in human beings. Council of Europe. rm.coe.int/greta-evaluation-report-on-iceland-third-evaluation-round-focus-access/1680ad10b1

Gunneflo, M., & Selberg, N. (2010). Discourse or merely noise? Regarding the disagreement on undocumented migrants. SSRN. doi.org/10.2139/ssrn.1559789

Haapasaari, S., Davis, T., Lietonen, A., Ollus, N., Jokinen, A., Pekkarinen, A-G., Risberg, M. (2024). From rights on paper to rights in action: Exploited migrant workers' access to remedy in the Baltic Sea Region. HEUNI Report series no. 109. heuni.fi/-/report-series-109-exploited-migrant-workers-access-to-remedy-in-the-baltic-sea-region#cfa0ab6b

Head, B. W. (2022). Wicked problems in public policy: Understanding and responding to complex challenges. Springer Nature.

International Labour Organization. (2009). Operational indicators of trafficking in human beings: results from a Delphi survey implemented by the ILO and the European Commission. Geneva International Labour Office. www.ilo.org/publications/operational-indicators-trafficking-human-beings

International Labour Organization. (2022). Dealing with Vulnerable Groups of Workers. ILO Curriculum on Building Modern and Efective Labour Inspection Systems Module 9. www.ilo.org/resource/building-modern-and-effective-labour-inspection-systems-dealing-vulnerable

International Labour Organization. (n.d.). Occupational safety and health. ILO Bureau for Employers' Activities. Accessed 1.11.2025. www.ilo.org/bureau-employers-activities/areas-work/occupational-safety-and-health

Iossa, A., & Persdotter, M. (2021). Cross border social dumping as a 'game of jurisdiction' – Towards a legal geography of labour relations in the EU internal market. Journal of Common Market Studies (JCMS), 59(5), 1086–1102. onlinelibrary.wiley.com/doi/10.1111/jcms.13166

Jahnsen, S. Ø. (2014). Menneskehandel og tvangsarbeid: En forstudie om gråsoneproblematikk innenfor innsatsområdet arbeidsmarkedskriminalitet. Politihøgskolen.

Jahnsen, S. Ø. (2024). Labour exploitation and work-related crime. The reshaping of the Norwegian media discourse on human trafficking and social dumping. Nordic Journal of Criminology, 25(1).

Jahnsen, S. Ø., & Rykkja, L. (2020). Coordinating for Analytical and Punitive Capacity: The Case of Work-related Crime in Norway. International Public Management Review, 20(1), 24-44.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Jahnsen, S. Ø., Gjesdal, A. M., & Andersen, G. (2022). Om fremveksten av en ny forståelsesramme for arbeidslivet og kampen mot arbeidslivskriminalitet. Norsk sosiologisk tidsskrift, (5), 8–24.

Johansson, M. (2024). Människohandel och människoexploatering på den svenska arbetsmarknaden. En uppföljning. The Swedish Gender Equality Agency and the Council of the Baltic Sea States. CBSS. cbss.org/wp-content/uploads/2024/06/cape-iii-report_20240607.pdf

Jokinen, A., Ollus, N. & Viuhko, M. (2011). Ehdoilla millä hyvänsä. Työperäinen ihmiskauppa ja ulkomaalaisten työntekijöiden hyväksikäyttö Suomessa. HEUNI Publication Series No. 67. Helsinki: HEUNI. heuni.fi/-/report-series-67 In English see: heuni.fi/-/report-series-68

Jokinen, A., Ollus, N. & Pekkarinen, A.-G. (2023). Review of actions against labour trafficking in Finland. HEUNI Report Series No. 99. heuni.fi/-/report-series-99b

Jokinen, A. Pekkarinen, A.-G., Turunen, T. & Huovinen, R. (2023). Selvitys ihmiskaupan uhreille annettavista harkinta-ajoista ja seksuaalipalvelujen myynnistä käännyttämisen perusteena. Sisäministeriön julkaisuja 2023:22. HEUNI Report Series No: 101. heuni.fi/documents/47074104/49491250/SM_2023_22.pdf/a0bd5e5e-4c2b-af1a-19fc-82d7f0c53133/SM_2023_22.pdf?t=1684826360462

Jämställdhetsmyndigheten (2024). Ett fortsatt stärkt arbet mot prostitution och människohandel 2023. Slutredovisning av uppdrag i enlighet med regleringsbrev för budgetåret 2023. (A2022/01653, A2022/01607(delvis)). Rapport 2024:3. jamstalldhetsmyndigheten.se/media/o4aintjg/rapport-2024-3-starkt-arbete-mot-prostitution-och-manniskohandel-2024-03-13.pdf

Jämställdhetsmyndigheten (2025a). Människohandel för tvångsarbete och annan arbetskraftsexploatering. För yrkesverksamma som vill förstå, förebygga och identifiera exploatering. Nationella samordningen mot prostitution och människohandel. Skriftserie nr. 2 2025. Jämställdhetsmyndigheten: Göteborg. jamstalldhetsmyndigheten.se/media/0xpf0sps/kunskaps%C3%B6versikt-arbetsplatsexploatering-2025.pdf

Jämställdhetsmyndigheten (2025b). Arbete mot prostitution och människohandel i Sverige 2024. Årsrapport från den nationella samordningen mot prostitution och människohandel (NSPM) vid Jämställdhetsmyndigheten: Göteborg. jamstalldhetsmyndigheten.se/aktuellt/publikationer/arbete-mot-prostitution-och-manniskohandel-i-sverige-2024/

Jönsson, Schoultz, I. & Jahnsen, S. (Forthcoming). Mimicry and Mobility: Exploring the Policy Travel of Work-Related Crime from Norway to Sweden. British Journal of Criminology.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Kauhanen, A. (2025). How Extension of Collective Agreements Affects Wages. Nordic Economic Policy Review 2025. Nordic Council of Ministers. pub.norden.org/nord2025-001/how-extension-of-collective-agreements-affects-wages.html

Kimpimäki, M. (2025). Ulkomaisten työntekijöiden hyväksikäyttö: ihmiskauppaa, kiskonnantapaista työsyrjintää vai alipalkkausta? Lakimies, 119(5), 785-811. journal.fi/lakimies/article/view/99919

Kiss, M. (2017). EPRS Briefing: Understanding social dumping in the European Union. European Parliamentary Research Service (EPRS). www.europarl.europa.eu/RegData/etudes/BRIE/2017/599353/EPRS_BRI(2017)599353_EN.pdf

Kjellberg, A. (2025). Changes in union density in the Nordic countries. In R. Uusitalo & A. Kauhanen (Eds.), Nordic Economic Policy Review 2025: Wage formation and the Nordic Model. Nordic Council of Ministers. pub.norden.org/nord2025-001/changes-in-union-density-in-the-nordic-countries.html

Koivukari, K., Korkka-Knuts, H., Mahmood, V. & Melander, S. (2022). Ihmiskauppa ja sen lähirikokset - Säännösten soveltamiskäytäntö. Valtioneuvoston selvitys- ja tutkimustoimikunnan julkaisuja 2022:18. Helsinki: Valtioneuvoston kanslia. julkaisut.valtioneuvosto.fi/server/api/core/bitstreams/c1821aa4-e30a-427e-9f6f-5147ba1b58cd/content

Koordineringsenheten mot menneskehandel KOM. (2025). Årsrapport 2024. Fra Koordineringsenheten mot menneskehandel. POD-publikasjon: 2025/10. Politiet. www.politiet.no/globalassets/03-rad-og-forebygging/menneskehandel/kom-tilstandsrapport-2024.pdf

Kyynäräinen, J. (2023). Työrikosten tutkinnan kehittäminen. Master thesis. Poliisiammattikorkeakoulu. www.theseus.fi/bitstream/handle/10024/811841/ON_Kyynarainen.pdf;jsessionid=543CC34304FF17FF8FDCD695CA031925?sequence=2

Lampinen, M. (2025). Presentation by the Finnish Immigration Service on residence permits at the Reilu työ -network meeting 16.5.2025 Helsinki. Nordic Council of Ministry 2022.

Lietuvos respublikos vidaus reikalų ministras (2024). Įsakymas dėl kovos su prekyba žmonėmis 2024–2026 metų veiksmų plano patvirtinimo. vrm.lrv.lt/public/canonical/1722602215/8148/VEIKSM%C5%B2%20PLANAS%2024-26%20Elektroninio+dokumento+nuora%C5%A1as.pdf

Lietuvos Seimo Kontrolieriai. (2025). 2024 metų kovos su prekyba žmonėmis padėties Lietuvos Respublikoje apžvalga. www.lrski.lt/wp-content/uploads/2025/08/2024-metu-kovos-su-prekyba-zmonemis-padeties-Lietuvos-Respublikoje-stebesenos-ataskaita.pdf

Lingaas, C., Haugland, B. & Skjeggestad, E. (2020). Menn Utsatt for Tvangsarbeid i Norge: En Rapport om Deres Erfaringer og Juridiske Situasjon [Men Exposed to Forced Labour in Norway: A Report on Their Experiences and Legal Situation]. hdl.handle.net/11250/2636555

Lingaas, C. (2022). Directing the Legal Radar at Forced Labour—Under Special Consideration of Male Victims in Norway. Laws, 11(3), 39. doi.org/10.3390/laws11030039

Maahanmuuttovirasto (Migri). (n.d.). Residence permit - Significant negligence or exploitation by employer. migri.fi/en/significant-negligence-or-exploitation-by-employer

Magaña Lopez, M., & Rye, J. F. (2024). Dual frames of reference: naturalization, rationalization and justification of poor working conditions. A comparative study of migrant agricultural work in Northern California and South-Eastern Norway. Journal of Ethnic and Migration Studies, 50(6), 1428–1445. doi.org/10.1080/1369183X.2023.2278403

Mešić, N. (2017). Framing solidarity in the unionisation of undocumented migrant workers. In C.-U. Schierup, A. Neergard, & A. Ålund (Eds.), Reimagineering the nation: Essays on twenty-first-century Sweden. Peter Lang Publishing Group.

Ministru kabineta (2025). Ministru kabineta 2025 gada 26. augusta rīkojums Nr. 534 Par Cilvēku tirdzniecības novēršanas plānu 2025.–2027. gadam. likumi.lv/ta/id/362691-par-cilveku-tirdzniecibas-noversanas-planu-2025-2027-gadam

Ministry of Economic Affairs and Employment (2024). Action plan against labour exploitation. Publications of the Ministry of Economic Affairs and Employment 2024:5. julkaisut.valtioneuvosto.fi/server/api/core/bitstreams/c7f2aba1-df8e-41b3-ba53-40d001145080/content

Ministry for Foreign Affairs of Finland. (2005). National plan of action against trafficking in human beings. um.fi/documents/35732/48132/national_plan_of_action_against_trafficking_in_human_beings__2005_/b90e843d-f4fd-d017-6a65-02c97a9405ac?t=1525859946599

Ministry of the Interior. (2017). Government Action Plan against Human Trafficking 2016–2017. Ministry of the Interior Publication 13/2017. julkaisut.valtioneuvosto.fi/server/api/core/bitstreams/32df8383-48bf-46c2-9d84-2def7899ae44/content

Moksnes, H. (2016). Papperslösa arbetare och möjligheterna för facklig organisering. In M. Sager, H. Holgersson, & K. Öberg (Eds.), Irreguljär migration i Sverige: Rättigheter, vardagserfarenheter, motstånd och statliga kategoriseringar. Daidalos.

Motiva Oy & HEUNI (2025). Vastuullisuus julkisissa siivouspalveluhankinnoissa – Ohjeita työperäisen hyväksikäytön ehkäisyyn ja valvontaan. Helsinki: Motiva Oy. www.motiva.fi/ajankohtaista/julkaisut/valvontamalli_tyoperaisen_hyvaksikayton_ehkaisemiseksi_-opas.15370.shtml

Moyce, S. C., & Schenker, M. (2018). Migrant workers and their occupational health and safety. Annual review of public health, 39(1).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Murphy, C., Doyle, D. M., & Thompson, S. (2022). Workers' Perspectives on State-Constructed Vulnerability to Labour Exploitation: Experiences of Migrant Fishers in Ireland. Social & Legal Studies, 32(4), 562-585. doi.org/10.1177/09646639221122466 (Original work published 2023)

MYNAK. (2024). The Impact of Work-related Crime on the Work Environment. Systematic literature review 2024:2. Swedish Agency for Work Environment Expertise (MYNAK). media.sawee.se/2024/10/THE_IM1.pdf.

Myndigheter mot arbetslivskriminalitet. (2024). Redovisning av uppdraget att inrätta regionala center mot arbetslivskriminalitet och om varaktig myndighetssamverkan. Follow-up report on a government mandate. www.av.se/globalassets/filer/publikationer/rapporter/redovisning-regionala-center-mot-arbetslivskriminalitet.pdf

National Assistance System (2025). Annual report 2024 on human trafficking. Ihmiskauppa.fi. ihmiskauppa.fi/wp-content/uploads/2025/03/AnnualReport2024.pdf

Nordic Councils of Ministers (2022). Nordisk Ministerråds samarbejdsprogram for arbejdsliv 2022-2024. Nordisk Ministerråds. norden.diva-portal.org/smash/get/diva2:1653956/FULLTEXT02.pdf

Norwegian Ministries (2019). Revised strategy for combating work-related crime. Oslo: Norwegian Ministries. regjeringen.no/contentassets/7f4788717a724ef79921004f211350b5/a-0049-e_revised-strategy-for-combating-work-related-crime.pdf

NTAES. (2024a). Registermanipulasjon. NTAES Rapport. Nasjonalt tverretatlig analyse- og etterretningssenter. www.ntaes.no/reports/NTAES%20Rapport%20Registermanipulasjon.pdf

Nasjonalt tverretatlig analyse- og etterretningssenter (NTAES). (2024b). Når lønnen uteblir: Om lønnstyveri – fenomen, modus og sårbarheter. ntaes.no/reports/NTAES%20Rapport%20N%C3%A5r%20l%C3%B8nnen%20uteblir.pdf

Office of the Prime Minister (2017). Strengthening European cooperation for combating work-related crime. Challenges and proposed measures. Report to The European Commission. www.regjeringen.no/contentassets/0931fcb84a444689bf70cdde1876b82b/workrelaterdcrime-report.pdf

Oikeusministeriö. (2025). Työperäistä hyväksikäyttöä koskevan sääntelyn muuttaminen – Työryhmämietintö. 2025:35. julkaisut.valtioneuvosto.fi/bitstream/handle/10024/166384/OM_2025_35_ML.pdf?sequence=1&isAllowed=y

Ollus, N., & Alvesalo-Kuusi, A. (2012). From cherry-picking to control: Migrant labour and its exploitation in Finnish governmental policies. Nordisk Tidsskrift for Kriminalvidenskab, 99(3), 376–398. tidsskrift.dk/NTfK/article/view/71807/103768

Ollus, N. (2016a). From Forced Flexibility to Forced Labour: The Exploitation of Migrant Workers in Finland. HEUNI Publication Series No. 84. HEUNI, Finland. heuni.fi/-/report-series-84

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Ollus, N. (2016b). Forced Flexibility and Exploitation: Experiences of Migrant Workers in the Cleaning Industry. Nordic Journal of Working Life Studies, 6(1), 25–45. doi.org/10.19154/njwls.v6i1.4908

Ollus, N., Korkman, J. Pekkarinen, A-G & Jokinen, A. (2024). Ihmiskaupparikosten esitutkinta uhrinäkökulmasta: Järjestöjen näkemyksiä ihmiskaupan uhrien auttamiseen ja sen haasteisiin esitutkinnassa. [Pre-trial Investigation of Human Trafficking Offences from the Victim's Perspective: NGO Views on Assisting Victims of Human Trafficking and the Challenges Faced During Pre-trial Investigation.] Poliisiammattikorkeakoulun raportteja 146. Poliisiammattikorkeakoulu: Tampere.

Overgaard, C., Jespersen, M., Høgedahl, L., & Thomsen, T. L. (2023). Migrants' work environment in the Danish construction sector, a scoping study. Nordic Journal of Working Life Studies, 13(3). doi.org/10.18291/njwls.135435

Pejtersen, J. H., Rotger, G. P., Rosenberg, A. W., Thuesen, F., & Overgård, C. H. (2025). Risiko for social dumping i danske virksomheder med udenlandske arbejdstagere. VIVE - Det Nationale Forsknings- og Analysecenter for Velfærd: København.

Pekkarinen, A.-G. & Jokinen, A. (2023). Patterns of exploitation. Trends and modus operandi in human trafficking in Finland, Latvia, Estonia, Poland and Ukraine. HEUNI Report series No 103a. HEUNI: Helsinki. heuni.fi/-/report-series-103-patterns-of-exploitation-elect-thb#a536aa20

Pekkarinen, A.-G., Jokinen, A., Rantala, A., Ollus, N. & Näsi, R. (2021). Selvitys ulkomaisen työvoiman hyväksikäytön torjunnan menettelyistä eri maissa. Työ- ja elinkeinoministeriön julkaisuja 2021:55. heuni.fi/-/selvitys-ulkomaisen-tyovoiman-hyvaksikayton-torjunnan-menettelyista-eri-maissa#cfa0ab6b

Pekkarinen, A.-G., Haapasaari, S., Jokinen, A., Lietonen, A., & Ollus, N. (2023). Mapping risks to migrant workers in supply chains in Europe. HEUNI & IOM. heuni.fi/-/mapping-risks-to-migrant-workers-in-supply-chains-in-europe

Piore, M. J (1979). Birds of Passage: Migrant Labor and Industrial Societies. Cambridge University Press.

Preisler, M. (2025a). New Danish legislation to tackle social dumping on construction sites. Nordic Labour Journal. Accessed 17.10.2025. www.nordiclabourjournal.org/new-danish-legislation-to-tackle-social-dumping-on-construction-sites/

Preisler, M. (2025b). A new route to Denmark for foreign workers. Nordic Labour Journal. www.nordiclabourjournal.org/a-new-route-to-denmark-for-foreign-workers/

Politiet. (2025). Øst politidistrikt - Trusselvurdering 2024–2025. www.politiet.no/globalassets/nyheter/ost/ltv-ost-pd-2024-2025---offentlig-versjon.pdf

Porru, S., & Baldo, M. (2022). Occupational health and safety and migrant workers: Has something changed in the last few years?. International Journal of Environmental Research and Public Health, 19(15).

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Rakennusteollisuus. (RT). (2024). Uusi RT-ohjekortti auttaa torjumaan työvoiman hyväksikäyttöä. rt.fi/tiedotteet-ja-uutiset/2024/10/uusi-rt-ohjekortti-auttaa-torjumaan-tyovoiman-hyvaksikayttoa/

Rakennustieto. (2024). RT 103754: Työvoiman hyväksikäytön torjunta rakennusalalla. www.rakennustietokauppa.fi/sivu/tuote/rt-103754-tyovoiman-hyvaksikayton-torjunta-rakennusalalla/5213063

Regeringens skrivelse (2020). Regeringens skrivelse 2020/21:169. Riksrevisionens rapport om statens insatser mot exploatering av arbetskraft. www.riksdagen.se/sv/dokument-och-lagar/dokument/skrivelse/riksrevisionens-rapport-om-statens-insatser-mot_h803169/html/

Regeringskansliet. (2022). Nationell strategi mot arbetslivskriminalitet. Regeringen. www.regeringen.se/contentassets/f6f461b-310984b598ee4f7a2d83350d0/nationell-strategi-mot-arbetslivskriminalitet.pdf

Regeringskansliet. (2023). Arbetslivskriminalitet – arbetet i Sverige, en bedömning av omfattningen, lärdomar från Danmark och Finland. Statens offentliga utredningar från Arbetsmarknadsdepartementet. www.regeringen.se/rattsliga-dokument/statens-offentliga-utredning-ar/2023/02/sou-20238/

Regjeringen. (2015). Strategi mot arbeidslivskriminalitet. Arbeids- och socialdepartementet. www.regjeringen.no/contentassets/4f7ae70171bd480682b8dafd-dadaf311/strategi_mot_arbeidslivskriminalitet.pdf

Regjeringen. (2022). Action plan to combat social dumping and work-related crime. Submitted by the Støre Government 1 October 2022. www.regjeringen.no/contentassets/d7c0a27f-b108424eae30bed75041c2aa/action-plan-to-combat-social-dumping-and-work-related-crime-2022.pdf

Regjeringen. (2025). Nasjonal strategi mot menneskehandel (2025–2030). Justis- og beredskapsdepartementet, Arbeids- og inkluderingsdepartementet, Barne- og familiedepartementet, Helse- og omsorgsdepartementet og Utenriksdepartementet. www.regjeringen.no/contentassets/07bb3c-5b2ea74f0aba5c0d53245a8a6b/no/pdfs/nasjonal-strategi-mot-menneskehandel.pdf

Riksrevisionen. (2020). Statens insatser mot exploatering av arbetskraft – regelverk, kontroller samt information och stöd till de drabbade. RIR 2020:27. www.riksrevisionen.se/download/18.2008b69c18bd-0f6ed3f29187/1607954480458/RiR%202020_27%20Anpassad.pdf

Ristikari, T. (2012). Finnish trade unions and immigrant labor (Siirtolaisuusinstituutin julkaisuja No. 304). Siirtolaisuusinstituutti. www.doria.fi/handle/10024/178500

Roth, V. & Luhtasaari, M. (2021). Finland fights human trafficking. Action Plan against Trafficking in Human Beings. Publications of the Ministry of Justice, Memorandums and statements 2021:24. the Ministry of Justice.

Räddningsmissionen. (2025). En praktisk handbok: Att möta offer för arbetsexploatering. raddningsmissionen.se/sites/default/files/element-files/Handbok-exploatering%20pa%CC%8A%20arbetsmarknaden-sidor-webb.pdf

Schenker, M. B. (2010). A global perspective of migration and occupational health. American journal of industrial medicine, 53(4).

Schoultz, I. & Muhire, H. (2023). Is there any criminal law protection for exploited migrant workers in Sweden? Logics of criminal law and the labour migration regime. Nordic Journal of Criminology, 24(2), 1-20.

Schoultz, I. & Muhire, H. (2024). Mobilizing the Rights of Migrant Workers: Swedish Trade Unions' Engagement with Law and the Courts. Nordic Journal of Human Rights, 42(1), 70–88. doi.org/10.1080/18918131.2023.2250678

Schoultz, I., & Smiragina-Ingelström, P. (2023). Access to justice and social rights for victims of trafficking and labour exploitation in Sweden. In Transformations of European Welfare States and Social Rights: Regulation, Professionals, and Citizens (pp. 147-167). Cham: Springer Nature Switzerland.

Selberg, N. & Gunneflo, M. (2010). Discourse or merely noise? Regarding the disagreement on undocumented migrants. International Journal of Comparative Labour Law & Industrial Relations, 12(2), 173.

Sisäasiainministeriö (2008). Ihmiskaupan vastainen tarkennettu toimintasuunnitelma. Sisäasiainministeriön julkaisuja 27/2008. Maahanmuutto. Helsinki: Sisäasiainministeriö.

Sjödin, E. (2021). Criminalisation as a response to low wages and labour market exploitation in Sweden. European Labour Law Journal, 12(4), 529-546. doi.org/10.1177/20319525211038015 (Original work published 2021).

Smiragina-Ingelström, P. (2024). REFRAMING THE NARRATIVE: The processes and outcomes of men's victimization in human trafficking. In Interconnecting the Violences of Men: Continuities and Intersections in Research, Policy and Activism (pp. 134-152). Taylor & Francis. doi.org/10.4324/9781003415077-9

Social- og Boligstyrelsen. (2024). Indikatorer – et redskab til at opspore menneskehandel. www.sbst.dk/udgivelser/2024/temarapport-indikatorer-et-redskab-til-at-opspore-menneskehandel

Spanger, M., Ollus, N., Schoultz, I., & Jahnsen, S. Ø. (2024). Same-same or different? Nordic policy responses to the exploitation of migrant workers. Nordic Journal of Criminology, 25(2).

Statens offentliga utredningar (2022). Arbetslivskriminalitet – en defnition – en inledande bedömning av omfattningen – lärdomar från Norge. SOU 2022:36. Delbetänkande av Delegationen mot arbetslivskriminalitet. Stockholm 2022

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Statens offentliga utredningar (2023). Arbetslivskriminalitet – arbetet i Sverige – en bedömning av omfattningen – lärdomar från Danmark och Finland. SOU 2023:8. Delbetänkande av Delegationen mot arbetslivskriminalitet. Stockholm 2023.

Statens offentliga utredningar (2024). Arbetslivskriminalitet – myndighetssamverkan – en gemensam tipsfunktion – lärdomar från Belgien och gränsöverskridande arbete. SOU 2024:14. Delbetänkande av Delegationen mot arbetslivskriminalitet. Stockholm 2024

Statens offentliga utredningar (2025). Arbetslivskriminalitet – upplägg – verktyg och åtgärder – fortsatt arbete. SOU 2025:25. Slutbetänkande av Delegationen mot arbetslivskriminalitet. Stockholm 2025.

Stenseth Huseby, J., & Ødegård, A. M. (2024). Fagorganisering av arbeidsinnvandrere: tid, tillit og trygghet (Fafo-rapport 2024:25). Fafo. www.fafo.no/publikasjoner/fafo-rapporter/fagorganisering-av-arbeidsinnvandrere-tid-tillit-og-trygghet

The Administration of Occupational Safety and Health. (n.d.). Everyone home safe. Ísland.is. Accessed 1.11.2025. island.is/en/o/aosh

Talonrakennusteollisuus & Rakennusliitto. (2024). Rakennusalan työehtosopimus 2025–2028. rakennusliitto.fi/media/rak_tes_2025-2028_netti.pdf

Transportministeriet. (2022). Handlingsplan til bekæmpelse af menneskehandel 2022–2025. Transportministeriet. www.trm.dk/media/wh0n23ks/handling-splan-til-bekaempelse-af-menneskehandel-2022-2025.pdf

Työsuojelu (2025a). Monitoring in numbers. Työsuojelu.fi. tyosuojelu.fi/en/about-us/functions/monitoring-in-numbers

Työsuojelu. (2025b). Ulkomaisen työvoiman käytön valvonta vuonna 2024. Occupational Safety and Health Administration Publications 3/2025. tyosuojelu.fi/documents/154017715/203855771/TSH-Raportti-Ulkovalvonta-2024-FI.pdf/

U.S. Department of State. (2025). Trafficking in persons report: Estonia. www.state.gov/reports/2024-trafficking-in-persons-report/estonia/

Weldehanna, L. (2024). Street-level decision-making in inter-agency collaboration: How inspectors of the Norwegian labour inspection authority implement policy to prevent work-related crime. Master thesis.

Verohallinto. (2024). Järjestäytynyt rikollisuus suomalaisessa yrityskentässä. Report 14/2024. www.vero.fi/globalassets/harmaa-talous-ja-talousrikollisuus/selvitykset/2024_14-j%C3%A4rjest%C3%A4ytynyt-rikollisuus-suomalaisessa-yrityskent%C3%A4ss%C3%A4.pdf

Verohallinto. (2025). Situational picture: Combating the grey economy reduces many types of crimes. Vero.fi. www.vero.fi/en/grey-economy-crime/phenomena/situational-picture/

Wintermayr, I. & Weatherburn, A. (2021). Access to protection and remedy for victims of human trafficking for the purpose of labour exploitation in Belgium and the Netherlands. International Labour Organization. www.ilo.org/publications/access-protection-and-remedy-victims-human-trafficking-purpose-labour

Workplace Denmark. (n.d.-a). Notification to the Register of Foreign Service Providers. workplacedenmark.dk/regulations-on-posting/register-foreign-service-providers-rut

Workplace Denmark. (n.d.-b). Working environment regulations. Accessed 1.11.2025. workplacedenmark.dk/health-and-safety/working-environment-regulations

Workplace Denmark. (n.d.-c). How does Arbejdstilsynet carry out inspections? – Inspection of foreign companies. Accessed 1.11.2025. workplacedenmark.dk/health-and-safety/inspection-of-foreign-companies

Ylinen, P., Jokinen, A., Pekkarinen, A.-G., Ollus, N., Jenu, K.-P. & Skur, T. (2020). Uncovering labour trafficking. Investigation tool for law enforcement and checklist for labour inspectors. Publication Series No. 95a. Helsinki: HEUNI. heuni.fi/-/report-series-no.-95a

Zimmerman, C., & Kiss, L. (2017). Human trafficking and exploitation: A global health concern. PLoS medicine, 14(11)

Laws and government proposals

Act on Workplace ID Cards and Workplace Surveillance (42/2010). www.althingi.is/lagas/154c/2010042.html

Arbejdstilsynet. (2021). Working Environment Act. Act on the working environment (Ministry of Employment, Consolidated Act no. 2062 of 16 November 2021). Arbejdstilsynet. at.dk/en/regulations/working-environment-act/

Article 153. (2008/ 12008E153). Consolidated version of the Treaty on the Functioning of the European Union, Part Three: Union policies and internal actions – Title X: Social policy – Article 153 (ex Article 137 TEC). Official Journal C 115, 9 May 2008. eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A12008E153

Directive 89/391 EEC. osha.europa.eu/en/legislation/directives/the-osh-framework-directive/the-osh-framework-directive-introduction

European Parliament (2016). European Parliament resolution of 14 September 2016 on social dumping in the European Union (2015/2255(INI)) www.europarl.europa.eu/doceo/document/TA-8-2016-0346_EN.html

HE 103/2014 vp. Hallituksen esitys eduskunnalle laiksi rikoslain muuttamisesta ja eräiksi siihen liittyviksi laeiksi.

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Handlingsplan mot sosial dumping og arbeidslivskriminalitet (2025). Lagt frem av Regjeringen Støre, august 2025. www.regjeringen.no/contentassets/6402ef20cd484751a3e4c98f736b5883/no/pdfs/handlingsplan-mot-sosial-dumping-og-arbeidslivskri.pdf

International Labour Organization Working Environment Convention, June 20, 1977. normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312293

Lovforslag L 14. (2024). Forslag til lov Om indkvartering af ansatte. Folketinget. www.ft.dk/samling/20241/lovforslag/L14/index.htm

Lovforslag L15. (2024). Forslag til lov om ændring af lov om udstationering af lønmodtagere m.v. og udlændingeloven. Folketinget. www.ft.dk/ripdf/samling/20241/lovforslag/l15/20241_l15_efter_2behandling.pdf

Regeringen. (2024). Proposition 2023/24:85 En ny lag om uppgiftsskyldighet för att motverka felaktiga utbetalningar från välfärdssystemen samt fusk, regelöverträdelser och brottslighet i arbetslivet. Swedish Government Proposal. www.regeringen.se/contentassets/d5398999f36646f9808398677447692a/en-ny-lag-om-uppgiftsskyldighet-for-att-motverka-felaktiga-utbetalningar-fran-valfardssystemen-samt-fusk-regelovertradelser-och-brottslighet-i-arbetslivet-prop.-20232485

The Finnish Aliens Act (301/2004).

The Finnish Employment Contracts Act (55/2001).

The Finnish Occupational Safety and Health Act (738/2002).

The Icelandic Act on Workplace ID Cards and Workplace Surveillance (42/2010).

The Swedish Aliens Act (2005:716).

The Swedish Criminal Code (1962:700).

The Swedish Work Environment Act (1977:1160).

Working Environment Act. (2005). Act relating to the working environment, working hours and employment protection. (LOV-2005-06-17-62). Lovdata. lovdata.no/dokument/NLE/lov/2005-06-17-62

Media sources

Aftonbladet. (4.11.2025). Gästarbetare i Boden planerar hungerstrejk: "Vill ha rättvisa". Aftonbladet. www.aftonbladet.se/nyheter/a/jQ8Ven/arbetare-pa-stegras-stalverk-i-boden-utan-lon-planerar-hungerstrejk

Arbetet. (6.12.2024). Domen: Wolt är arbetsgivare åt matbuden. Arbetet. arbetet.se/2024/12/06/dom-wolt-ar-arbetsgivare-at-matbuden/

Arbetet. (6.11.2025). 19 omhändertogs efter tillslag mot prestigeprojektet Stegra i Boden. Arbetet. arbetet.se/2025/11/06/19-omhandertogs-efter-tillslag-mot-prestigeprojektet-stegra-i-boden/

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Byggnads. (5.9.2024). Ny granskningsfunktion ger miljoner till byggnadsarbetare. Byggnads.se. www.byggnads.se/aktuellt/2024/september/ny-granskningsfunktion-ger-miljoner-till-byggnadsarbetare/

Byggnadsarbetaren. (11.11.2025). Fler behöver lämna landet efter polisinsatsen mot Stegra. Byggnadsarbetaren. www.byggnadsarbetaren.se/fler-behover-lamna-landet-efter-polisinsatsen-mot-stegra/

Byggnadsarbetaren. (24.9.2025). 50 arbetare som blåstes på Stegra-lön får pengar – men andra får vänta. Byggnadsarbetaren. www.byggnadsarbetaren.se/50-arbetare-som-blastes-pa-stegra-lon-far-pengar-men-andra-far-vanta/

DR. (28.11.2024). Ulykken på Fyn understreger, at udenlandske arbejdere er særligt udsatte i byggebranchen. DR. www.dr.dk/nyheder/indland/ulykken-paa-fyn-understreger-udenlandske-arbejdere-er-saerligt-udsatte-i

DR. (30.11.2024). Nabo melder commune til politiet efter silo ulykke: Hvorfor må man bygge uden tilladelse?. DR. www.dr.dk/nyheder/indland/nabo-melder-kommune-til-politiet-efter-silo-ulykke-hvorfor-maa-man-bygge-uden

Fellesforbundet. (12.2.2025). Woltsyklister vant i retten. Fellesforbundet. www.fellesforbundet.no/aktuelt/nyheter/2025/wolt-syklister-vant-i-retten/

Frifagbevegelse. (28.2.2024). Hamid ble lurt av sjefen. Nå skylder han staten 200.000 kroner. frifagbevegelse.no/nyheter/hamid-ble-lurt-av-sjefen-na-skylder-han-staten-200000-kroner-6.158.1030267.e7b3f97db4

Frifagbevegelse. (19.2.2025). Daglig leder må i fengsel etter grovt lønnstyveri. Frifagbevegelse .frifagbevegelse.no/nettverk/daglig-leder-ma-i-fengsel-etter-grovt-lonnstyveri-6.158.1115097.c6dd982bff

Helsingin Sanomat. (28.2.2023). Pimeitä kuljetuksia. HS.fi. www.hs.fi/pkseutu/art-2000009517649.html

Helsingin sanomat. (31.10.2024). Silmille roiskui happoa ja työntekijä putosi kaksi metriä maahan – ”Työnantaja pakotti jatkamaan töitä”, hän kuvasi poliisille. Helsingin sanomat. www.hs.fi/suomi/art-2000010787190.html

KSML. (25.2.2025). Käräjäoikeus hylkäsi syytteet kiinalaisten kivityömiesten ihmiskauppajutussa. Keskisuomalainen. www.ksml.fi/uutissuomalainen/8318657

Mbl.is. (5.5.2025). Berjast gegn brotastarfsemi á vinnumarkaði. Mbl.is. www.mbl.is/frettir/innlent/2025/05/05/berjast_gegn_brotastarfsemi_a_vinnumarkadi/

Nordic Labour Journal. (25.9.2025). The case that opened Iceland's eyes to the scale of workplace crime. Nordic Labour Journal. www.nordiclabourjournal.org/the-case-that-opened-icelands-eyes-to-the-scale-of-workplace-crime/

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Proletären. (25.6.2025). Desperata byggnadsarbetare försökte stjäla mat. Proletären. proletaren.se/artikel/desperata-byggarbetare-forsokte-stjala-mat/

Rakennusliitto. (5.8.2025). Kansainvälisen työvoiman yksikkö taistelee harmaata taloutta vastaan. Rakennusliitto.fi. rakennusliitto.fi/ajankohtaista/2025/08/05/kansainvalisen-tyovoiman-yksikko-taistelee-harmaata-taloutta-vastaan/

Regjeringen. (13.2.2024). Høring - Forslag om strengere straffebestemmelse for grov utnytting av utlendinger i arbeids- og boligforhold mv. Regjeringen. www.regjeringen.no/no/dokumenter/horing-forslag-om-strengere-straffebestemmelse-for-grov-utnytting-av-utlendinger-i-arbeids-og-boligforhold-mv/id3025441/

RÚV. (8.10.2024). Shattered dreams of workers in Iceland. RÚV. www.ruv.is/english/2024-10-08-shattered-dreams-of-workers-in-iceland-423973

SVT Nyheter. (12.12.2023). Fem personer döda i hissolyckan i Sundbyberg. SVT Nyheter. www.svt.se/nyheter/lokalt/stockholm/alla-i-hissolyckan-avlidna--qkwkhg

SVT Nyheter. (13.12.2023). Erfaren byggarbetare bland de döda i hissolyckan. SVT Nyheter. www.svt.se/nyheter/lokalt/stockholm/erfaren-byggarbetare-bland-de-doda-i-hissolyckan--lifq8k

SVT Nyheter. (12.12.2024). Ett år efter hissolyckan – nu ska EU utreda leverantörsled. SVT Nyheter. www.svt.se/nyheter/lokalt/stockholm/ett-ar-efter-hissolyckan-nu-ska-eu-utreda-leverantorsled

SVT Nyheter. (6.11.2025a). Fackets: "När vi ställde krav lämnade Ankitech landet". SVT www.svt.se/nyheter/lokalt/norrbotten/fackets-nar-vi-stallde-krav-lamnade-ankitech-landet

SVT Nyheter. (6.11.2025b). Europol om insatsen på Stegra: "Gjort intressanta träffar". SVT. www.svt.se/nyheter/lokalt/norrbotten/europol-om-insatsen-pa-stegra-gjort-intressanta-traffar

SVT Nyheter. (7.11.2025). Razzian på Stegra – arbetare som skulle utvisas gick fria. SVT. www.svt.se/nyheter/lokalt/norrbotten/razzian-pa-stegra-arbetare-som-skulle-utvisas-gick-fria

SVT Nyheter. (23.11.2025). Reste från Turkiet för Stegraprotest – "Inga pengar att ta oss hem". SVT. www.svt.se/nyheter/lokalt/norrbotten/reste-fran-turkiet-for-stegraprotest-inga-pengar-att-ta-oss-hem

SVT Nyheter. (3.12.2025). Stegras åtgärd efter razzian – 280 arbetare tvingas lämna. SVT. www.svt.se/nyheter/lokalt/norrbotten/stegras-atgard-efter-razzian-280-arbetare-tvingas-lamna

CONTENT
PART I
PART II
PART III
REFERENCES
FACT SHEET
CHECKLIST

Tekijä. (13.8.2024). Riikka Vasama: Our role is to increase understanding and competence about how working life is perceived by foreign workers. Tekijä-lehti. tekijalehti.fi/2024/08/13/riikka-vasama-our-role-is-to-increase-understanding-and-competence-about-how-working-life-is-perceived-by-foreign-workers/

Teknisk LAndsforbund. (16.9.2025). Underbetaling er udansk: Stort flertal siger klart nej til udnyttelse af udenlandsk arbejdskraft. Teknisk LAndsforbund. tl.dk/faa-viden-og-inspiration/tl-nyheder/artikler-tl-nyheder/ny-analyse-fra-dansk-byggefag/

YLE. (30.5.2023). Ihmiskaupasta epäillyt yritykset saavat jatkaa toimintaansa Oulaisissa, ja osa uhreista työskentele työpaikassa edelleen. yle.fi/a/74-20034287

YLE. (23.4.2023). HS: Some couriers illegally delivering on apps. yle.fi. yle.fi/a/74-20028470

YLE. (4.7.2023). Yksi Oulaisten ihmiskauppajutun epäillyistä on tällä hetkellä vangittuna – kivialan tehtaassa edelleenkin puutteita. Yle. yle.fi/a/74-20039638

Åklagarmyndigheten. (29.8.2025). Tre åtalas efter att fem personer dog på byggarbetsplats i Sundbyberg. Åklagarmyndigheten. www.aklagare.se/for-media/pressmeddelanden/2025/augusti/tre-atalas-efter-att-fem-personer-dog-pa-byggarbetsplats-i-sundbyberg/

Fact sheet

Work-Related Crime, Labour Exploitation and Occupational Safety



Anniina Jokinen
Natalia Ollus

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

Nordic Council of Ministers

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

Fafo

Lund University
Sociology of Law Department
Faculty of Social Sciences

Fact sheet

Work-Related Crime, Labour Exploitation and Occupational Safety

What are the key concepts used?

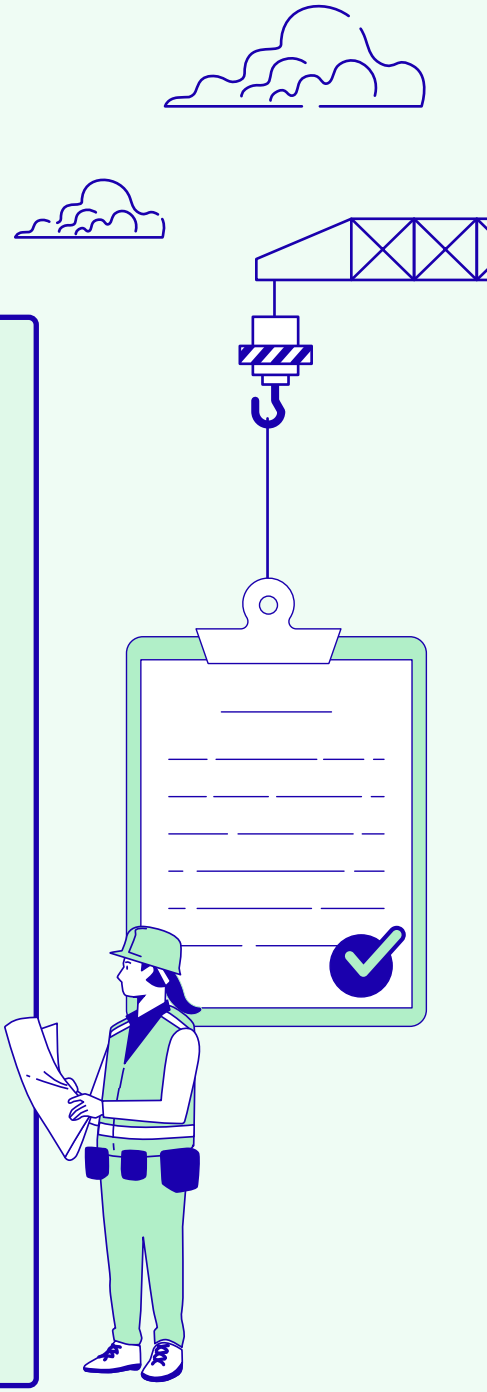
WORK-RELATED CRIME refers to violations of laws and regulations connected to employment and working life. It involves intentional actions by business owners, acting alone or with others, to violate rules or agreements in the workplace, harming employees, other businesses, or the State. This encompasses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

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

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

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

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



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

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

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



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

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

What approaches do Nordic countries apply to tackle the risks?

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

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

The Intergrate project

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

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

You can find the videos here →

Checklist

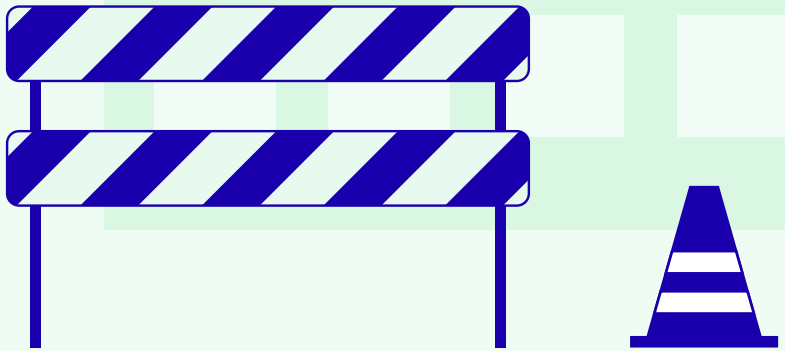
Uncovering Occupational Safety Risks Linked to Labour Exploitation

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

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

In addition, labour inspectors can enforce labour law by imposing sanctions on employers who commit offences or violations, which may include fines, and corrective measures. Also, other key inspection authorities (e.g., food safety and fire inspectors) may impose measures such as closure of businesses or withdrawal of licences. Recognising risks and patterns of exploitation by combining different observations is essential: individual observations may appear minor, but together they can reveal exploitative practices. The information can be obtained through discussions with workers and employers, as well as through observations of the workers' appearance, mental status, and various aspects of workplace safety and adherence to key occupational safety and health protocols.

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



INTEGRATE

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

Nordic Council of Ministers

HEUNI

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

Fafo

Lund University

Sociology of Law Department

Faculty of Social Sciences

THE CONTENT of the publication represents the views of the authors only and is their sole responsibility. The Nordic Council of Ministers does not accept any responsibility for use that may be made of the information it contains.

Checklist

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

1 Breaches concerning workplace inductions

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

2 Breaches concerning working hours

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

3 Breaches concerning work clothing and gear

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

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

4 Breaches concerning employment responsibilities

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

5 Breaches concerning safety measures

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

> **We've had a number of migrant asbestos removers who work completely without any masks or protective equipment.**
>
> — NGO representative, Finland

6 Breaches concerning employer-provided accommodation

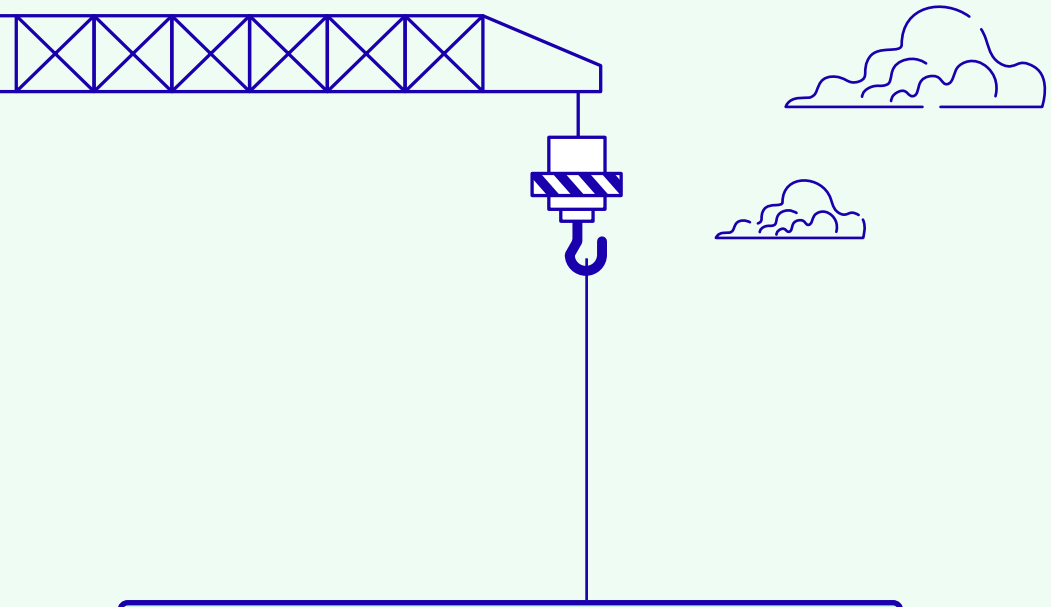
- ☐ **Signs of living** in the place of work (e.g. mattresses in backroom of a restaurant).
- ☐ **Poor and crowded** accommodation organised by the employer.
- ☐ **Lack of appropriate** toilet and washing facilities, e.g. in seasonal agricultural work.
- ☐ **High level** of surveillance in the accommodation.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

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

7 Breaches concerning psychosocial stress

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

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



Additional indicators of labour exploitation include

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

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

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

If it is a case of emergency, call 112

Tips for encounters with migrant workers who may have experienced exploitation

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

Recommended reading

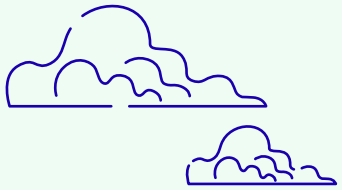
REPORT SERIES Nº 95a: Uncovering labour trafficking. Investigation tool for law enforcement and checklist for labour inspectors | Heuni.

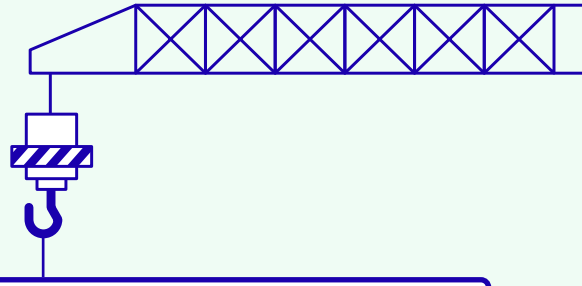
POLICY BRIEF 2/31.8.2020: How to uncover labour trafficking and exploitation? The route to a successful investigation | Heuni.

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

REPORT SERIES №109: "From rights on paper to rights in action" – Exploited migrant workers' access to remedy in the Baltic Sea Region | Heuni.







Key national contact details

Denmark

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

Finland

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

Iceland

- **The Administration of Occupational Safety and Health.** vinnueftirlit@ver.is. Tel: 550 4600.
- Notify us | **The Administration of Occupational Safety and Health.**
- **Icelandic labour law.** Vinnuréttarvefur ASÍ. asi@asi.is. Tel: 53 55 600.
- **1717 Icelandic Red Cross** Helpline/ Web Chat. Tel: 1717.

Norway

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

Sweden

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


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