



**Declassified<sup>1</sup>**

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## **Committee on Social Affairs, Health and Sustainable Development**

### **Minutes**

#### **of the hearing on Sustainable European guidelines to counter social dumping and strengthen collective bargaining mechanisms, held in Helsinki on Friday 16 May 2025**

**Ms Saskia Kluit**, Chairperson of the Committee, opened the hearing and welcome the guest speakers:

- Ms Natalia Ollus, Director, European Institute for Crime Prevention and Control, affiliated with the United Nations (HEUNI);
- Mr Samuli Hiilesniemi, lawyer, Central Organization of Finnish Trade Unions (SAK);
- Ms Pia Marttila, Coordinating Senior Advisor, Victim Support Finland (RIKU).

The aim of the hearing was to gather information from experts on the situation in Finland regarding measures to counter social dumping and exploitation through work. The results of the discussion would be used in the preparation of a report on “Sustainable European guidelines to counter social dumping and strengthen collective bargaining mechanisms” being prepared by Ms Valérie Piller Carrard (Switzerland, SOC). Although the rapporteur could not be present at the hearing, she would get, in due course, the summary of today’s hearing.

**Ms Marttila** started her presentation by explaining the work of the specialised Service for Victims of Trafficking and Related Crimes / Victim Support Finland (RIKU) which was an NGO running 20 offices in the country. RIKU contributed to the public service effort which provided regular services under the European Union’s Directive on victims of labour exploitation<sup>2</sup>; it was funded by the Finland’s Ministry of Justice and the Centre for Social Welfare and Health Organisations (STEA).

Social dumping was distinct from labour exploitation. It induced damage to the society as a whole through market distortion which penalised the operation of law-abiding enterprises. It was very difficult to uncover without exploited workers signalling abuse. As a hidden phenomenon, it also escaped statistics but could lead to the snowballing of criminality if public authorities turned a blind eye to it. RIKU was the first point of contact for exploited workers who could receive confidential counselling; its activities covered also support to victims of human trafficking. 289 labour exploitation cases were reported in 2024, with majority of victims ending up filing a criminal complaint. Most exploited workers were of foreign origin holding a work permit.

Labour exploitation mainly occurred in the services sector (notably in agriculture for seasonal work, restaurants, cleaning and housekeeping, car repairs, construction industry) among the low-paid workers recruited abroad and whose residence permit was tied to their work permit. Victims were grossly underpaid and typically worked excessive hours. In the past, berry-picking activity in a forest had not been classified as employment. Exploitative employment had often been presented as “salary disputes” and was complex to investigate. It clearly contributed to underpinning an underground economy and a segregated job market.

RIKU’s work helped to identify labour exploitation cases and new trends, understand mechanisms of exploitation, dismantle criminal networks, accelerate investigations and close legal loopholes. Identification of exploitation cases should be followed by tangible consequences for the perpetrators and assistance, protection and compensation for the victims. Lack of attention to data analysis could lead to impunity, increase in exploitation

<sup>1</sup> The minutes were approved and declassified by the Committee on Social Affairs, Health and Sustainable Development at its meeting on 24 June 2025.

<sup>2</sup> Directive (EU) 2024/1712 amending Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims.

and social dumping. Focusing only on the worst cases could lead to continued exploitation and its normalisation. Cooperation of different stakeholders (authorities, NGOs, trade unions and others) was essential combating exploitation through work.

**Ms Ollus** then described the research of the European Institute for Crime Prevention and Control (HEUNI) on labour exploitation, human trafficking and forced labour. The institute worked in close contact with authorities, labour market entities, businesses, public procurement units and NGOs to develop targeted responses and concrete tools. While social dumping was essentially an economic problem, the labour exploitation facet illustrated the problem of violation of fundamental rights of individuals concerned. The latter suffered from pressure related to working conditions, notably excessive working time and no extra pay for overtime, underpayment and withholding of pay, violence or a threat thereof, and confiscation of ID documents, unreasonable or unlawful recruitment fees and/or restriction of movement. Underpayment was by far the most common aspect of labour exploitation but as such it was not criminalised in most countries; it was a combination of infringements that characterised labour exploitation most accurately. Cross-country comparisons showed that Finland was quite ahead of many other European countries in addressing labour exploitation.

The Finnish approach sought to identify crime victims and understand their vulnerabilities by combining both specialised and multidisciplinary interventions. Understanding the psychological control mechanism was essential to effectively detecting and prosecuting labour exploitation. In Finland, the first legal provisions and policy programmes had seen the day over 2004-2010 period. This included the first national action plan against human trafficking which also covered labour exploitation. Over the next seven years, research had been conducted, parliamentary reports had been published, case law had developed and victim support measures had been strengthened. Since 2019, a major governmental programme was rolled out and media shed light on the phenomenon. In 2024, a national action plan against labour exploitation had been launched.

In terms of expertise, the national system included a specialised nation-wide police unit and a specialised prosecutors' network, the Assistance System for Victims of Trafficking, the Victim Support Finland, civil society initiatives, independent national rapporteur, governmental anti-trafficking coordinator, a dedicated unit within the Labour Inspectorate and empirical research and guidance by HEUNI. Specialised labour inspectors had a mandate to oversee the labour conditions of migrant workers and to refer victim to support services; they could rely on special guidelines for handling the potential cases of exploitation and had an obligation to report exploitation, trafficking and related crimes to the police. Sector-specific guidelines for businesses had been published in 2023-2024 (regarding international recruitments in healthcare, social welfare and constructions sites).

The Finnish legislation (Aliens Act, chapter 4, section 54.b) had put in place a specific permit category for exploited migrant workers which enabled exploited workers to switch to another employer without any restrictions over their sector of work. However, if the employer was suspected of violating immigration rules, the permit was denied to those engaging in work under first permits but without prejudice to obtaining a permit with a different employer. Information to migrant workers was provided by the Government through Work Help Finland mobile application, by trade unions and by civil society organisations.

**Mr Hiilesniemi** spoke of labour exploitation as part of the underground economy which sprawled to more vulnerable sectors. All measures should be targeted to the key sectors where labour exploitation actually occurred (notably construction, cleaning, food catering and agriculture sectors). Research had shown the importance of the role of occupational health professionals, and with regard to cases of non-respect for minimum wage requirements, collective bargaining offered reinforced protections. From a trade union perspective, social dumping was a key issue because of a breach of equality of rights). Prevention worked through national administrative channels but also through international mechanisms enabling a country to refer to the minimum standards established by the ILO (International Labour Organisation), such as for the foreign vessels passing through Finland.

**Mr Fridez** noted that different European countries faced very similar challenges in terms of labour exploitation. These notably included the need to counter illegal labour, to ensure a proper pay and effective controls, and to guarantee adequate working conditions. What was probably different was the treatment of victims.

**Ms Marttila** agreed with Mr Fridez. Most migrant workers were employed legally, and all looked correct on paper. In reality, there were breaches of labour regulations and conditions which concerned a small percentage of workers. When the irregularities were detected, the residence permit would be extended for the duration of procedures. Finland sought to avoid a vicious circle of perpetuating abuses by issuing new residence permits to those reporting labour exploitation so that they could find a new job.

**Ms Ollus** then added that Finland had the reflection period which was granted to victims of human trafficking or presumed victims of trafficking to enable them to apply for a residence permit in the country.

**The Chairperson** referred to the situation in her country, the Netherlands, where by far the biggest problems were linked to persons who were allowed to work in the Netherlands but became victims of labour exploitation because of unscrupulous employers.

Further to an additional question by **Mr Fridez, Ms Martilla** explained that exploited workers typically did not belong to trade unions. They constituted unfair competition vis-à-vis regular, law-abiding workforce. In recent years, more and more trade unions had understood that addressing the problems of the non-union members and exploited workers also benefited their members directly because as long as there was a large group of underpaid workforce, it brought the general salary level down. Moreover, this disincentivised the hiring of competent local workers who would not work for less than the collective agreement provided for.

**Mr Hiilesniemi** confirmed that many trade unions nowadays took the issues faced by the non-union members very seriously. Underpayment affected not only exploited workers but also regular workers.

**Ms Ollus** also commented on underpayment which had been discussed in Finland for many years as to whether it should be criminalised as a specific offense or not. One prominent suggestion recommended to apply the provisions of fraud and usury instead of underpayment as a specific separate offense and this had been then introduced into the law used by the labour inspectors, helping to address underpayment through the existing criminal categories. There was also a working group at the Ministry of Justice which was looking into the option of introducing a new criminal provision on 'usury in working life', which would target not only underpayment, but also other kinds of exploitation.

**The Chairperson** warmly thanked the experts for sharing their know-how, experience and for standing up for workers in vulnerable situations. She then closed the hearing.

## List of presence / Liste de présence

(The names of members who took part in the meeting are in bold /  
Les noms des membres ayant pris part à la réunion sont en caractères gras)

Chairperson / Président·e:

<b>Ms / Mme Saskia Kluit</b>	
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Vice-Chairpersons / Vice-Président·e·s :

Ms / Mme Danuta Jazłowiecka	
<b>Mr / M. Armen Gevorgyan</b>	
Lord Don Touhig	

<b>Members / Membres</b>	<b>Country / Pays</b>	<b>Alternates / Remplaçant·e·s</b>
Ms Jorida Tabaku	Albania / Albanie	Zz...
Mr Cerni Escalé	Andorra / Andorre	Mme Bernadeta Coma
<b>Mr Armen Gevorgyan</b>	Armenia / Arménie	Ms Hripsime Grigoryan
Mr Stefan Schennach	Austria / Autriche	Ms Doris Bures
Mr Andreas Minnich	Austria / Autriche	Ms Agnes Sirkka Prammer
<b>Ms Anne Lambelin</b>	Belgium / Belgique	Mr Andries Gryffroy
M. Benoît Lutgen	Belgium / Belgique	Mme Véronique Durenne
Ms Darijana Filipović	Bosnia and Herzegovina / Bosnie-Herzégovine	Mr Šemsudin Dedić
Ms Atidzhe Alieva-Veli	Bulgaria / Bulgarie	Zz...
Ms Petya Tsankova	Bulgaria / Bulgarie	Zz...
Ms Zdravka Bušić	Croatia / Croatie	Ms Rada Borić
Ms Christiana Erotokritou	Cyprus / Chypre	Mr Constantinos Efstathiou
Ms Ivana Mádllová	Czechia / Tchéquie	Mr Aleš Juchelka
Ms Michaela Šebelová	Czechia / Tchéquie	Mr Ondřej Šimetka
Ms Camilla Fabricius	Denmark / Danemark	Ms Karin Liltorp
Ms Hanah Lahe	Estonia / Estonie	Zz...
Ms Minna Reijonen	Finland / Finlande	<b>Ms Miapetra Kumpula-Natri</b>
Mme Sophia Chikirou	France	Ms Sabrina Sebaihi
M. Alexandre Dufosset	France	Mme Liliana Tanguy
M. Alain Milon	France	M. Alain Cadec
Mme Maud Petit	France	M. Jean Laussucq
Zz...	Georgia / Géorgie	Zz...
<b>Ms Heike Engelhardt</b>	Germany / Allemagne	Ms Franziska Kersten
Mr Andrej Hunko	Germany / Allemagne	Ms Catarina Dos Santos-Wintz
Mr Christian Petry	Germany / Allemagne	Ms Martina Stamm-Fibich
Mr Harald Weyel	Germany / Allemagne	Ms Katrin Staffler
Ms Maria Syrengela	Greece / Grèce	Ms Maria-Nefeli Vasileiou Chatziioannidou
<b>Mr Georgios Stamatis</b>	Greece / Grèce	Mr Alexis Tsipras
Ms Mónika Bartos	Hungary / Hongrie	Mme Katalin Csöbör
Ms Mónika Dunai	Hungary / Hongrie	Ms Zita Gurmai

Mr Ragnar Þór INGÓLFSSON	Iceland / <i>Islande</i>	Ms Kolbrún Áslaugar
<b>Mr Joseph O'Reilly</b>	Ireland / <i>Irlande</i>	Mr Rónán Mullen
Ms Elena Bonetti	Italy / <i>Italie</i>	Mr Roberto Rosso
<b>Ms Aurora Floridia</b>	Italy / <i>Italie</i>	Mr Giuseppe De Cristofaro
Mr Alessandro Giglio Vigna	Italy / <i>Italie</i>	Mr Graziano Pizzimenti
Mr Stefano Maullu	Italy / <i>Italie</i>	Mr Francesco Zaffini
M. Andris Bērziņš	Latvia / <i>Lettonie</i>	Mr Edmunds Cepurītis
Mr Peter Frick	Liechtenstein	Ms Franziska Hoop
Ms Orinta Leiputė	Lithuania / <i>Lituanie</i>	Mr Zigmantas Balčytis
Mme Stéphanie Weydert	Luxembourg	M. Paul Galles
Mr Michael Farrugia	Malta / <i>Malte</i>	Mr Joseph Beppe Fenech Adami
Mr Ion Groza	Republic of Moldova / <i>République de Moldova</i>	Ms Diana Caraman
Mme Christine Pasquier-Ciulla	Monaco	Mme Béatrice Fresko-Rolfo
<b>Mr Miloš Konatar</b>	Montenegro / <i>Monténégro</i>	Mr Boris Mugoša
<b>Ms Saskia Kluit</b>	Netherlands / <i>Pays-Bas</i>	Ms Elly Van Wijk
Ms Carla Moonen	Netherlands / <i>Pays-Bas</i>	Mr Theo Bovens
<b>Mr Bekim Kjoku</b>	North Macedonia / <i>Macédoine du Nord</i>	Mr Sadula Duraki
Ms Lisa Marie Ness Klungland	Norway / <i>Norvège</i>	Ms Linda Hofstad Helleland
Ms Danuta Jazłowiecka	Poland / <i>Pologne</i>	Mr Mirosław Adam Orliński
<b>Mr Jan Filip Libicki</b>	Poland / <i>Pologne</i>	Ms Magdalena Biejat
Mr Ryszard Petru	Poland / <i>Pologne</i>	Zz...
Ms Jamila Madeira	Portugal	Mr Nuno Fazenda
Mr Carlos Silva Santiago	Portugal	Mr Telmo Faria
Georgeta-Carmen Holban	Romania / <i>Roumanie</i>	Ms Mirela Elena Adomnicai
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<b>Mr Gerardo Giovagnoli</b>	San Marino / <i>Saint-Marin</i>	Ms Alice Mina
Mr Vladimir Đorđević	Serbia / <i>Serbie</i>	Mr Predrag Marsenić
Ms Tatjana Pašić	Serbia / <i>Serbie</i>	<b>Ms Jelena Milošević</b>
Mme Anna Záborská	Slovak Republic / <i>République</i>	Mr Pavol Goga
Mr Dean Premik	Slovenia / <i>Slovénie</i>	Ms Iva Dimic
<b>Ms María Fernández</b>	Spain / <i>Espagne</i>	Mr Alfonso Rodríguez
<b>Mr José Latorre</b>	Spain / <i>Espagne</i>	Ms Marta González Vázquez
<b>Ms Carmen Leyte</b>	Spain / <i>Espagne</i>	Ms Luz Martinez Seijo
Ms Sofia Amloh	Sweden / <i>Suède</i>	Ms Annika Strandhäll
Ms Victoria Tiblom	Sweden / <i>Suède</i>	Ms Boriana Åberg
Mme Céline Amaudruz	Switzerland / <i>Suisse</i>	Mme Valérie Piller Carrard
Ms Sibel Arslan	Switzerland / <i>Suisse</i>	<b>M. Pierre-Alain Fridez</b>
Ms Gökçe Gökçen	Türkiye	Mr Namık Tan
Mr Berdan Öztürk	Türkiye	<b>Ms Sevilay Celenk Özen</b>
Mr Sevan Sivacioğlu	Türkiye	Ms Sena Nur Çelik Kanat
<b>Mr Cemalettin Kani Torun</b>	Türkiye	Mr Mustafa Kaya
<b>Ms Olena Khomenko</b>	Ukraine	<b>Ms Larysa Bilozir</b>
Ms Yuliia Ovchynnykova	Ukraine	Mr Andrii Lopushanskyi

Ms Lesia Zaburanna	Ukraine	Mr Rostyslav Tistyk
Ms Alicia Kearns	United Kingdom / <i>Royaume-Uni</i>	<b>Mr Dan Aldridge</b>
Ms Kate Osamor	United Kingdom / <i>Royaume-Uni</i>	Mr Perran Moon
Ms Elaine Stewart	United Kingdom / <i>Royaume-Uni</i>	Mr Mike Reader
Lord Don Touhig	United Kingdom / <i>Royaume-Uni</i>	Ms Michelle Welsh

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Ms / Mme Vera Damjanović, Montenegro / Monténégro

Mr / M. Sabih Gazi Öztürk, Türkiye

Ms / Mme Fatma Ebrar Özcan, Türkiye

**Experts / Expert-es**

Mr / M. John Patrick Clarke, Vice President, European Disability Forum

Ms / Mme Natalia Ollus, Director, European Institute for Crime Prevention and Control, affiliated with the United Nations (HEUNI)

Mr / M. Samuli Hiilesniemi, lawyer, Central Organization of Finnish Trade Unions (SAK)

Ms / Mme Pia Marttila, Coordinating Senior Advisor, Victim Support Finland (RIKU)

**Representative of the Turkish Cypriot Community (\*) /  
Représentant de la communauté chypriote turque (\*)**

Mr / M. Oğuzhan Hasipoğlu

(\*) In accordance with Resolution 1376 (2004) / Conformément à la Résolution 1376 (2004)

**Secretariat of the Parliamentary Assembly / Secrétariat de l'Assemblée parlementaire**

Ms / Mme Louise Barton, Director of Committees / Directrice des commissions

Ms / Mme Olga Kostenko, Programme Manager, Co-ordinator of Assembly activities to support Ukraine /  
Responsable de programme, Coordinatrice des activités de l'Assemblée pour soutenir l'Ukraine

Committee on Social Affairs, Health and Sustainable Development /  
Commission des questions sociales, de la santé et du développement durable

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 Ms / Mme Aiste Ramanauskaitė ..... Secretary to the Committee / Secrétaire de la commission  
 Ms / Mme Jannick Devaux ..... Secretary to the Committee / Secrétaire de la commission  
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 Ms / Mme Xenia Birioukova.....Assistant/ Assistante  
 Ms / Mme Özgü Tan.....Assistant/ Assistante